



Modern Slavery Policy¹

Foreword

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Application

This policy applies to all individuals working at all levels of the organisation, including trustees, employees, consultants, interns and other voluntary workers, casual and agency staff as well as all sub-contractors, suppliers and partners, together known as “RUSI Staff”.

To be clear, it applies to all consultants and subcontractors when it comes to their engagements with RUSI. This means that consultants and subcontractors will be required to report any incidents in relation to the conduct described below if they impact in any way their engagement with RUSI or relate to a project/contract in which RUSI is involved.

¹ This policy does not form part of a contract of employment or other contract to provide services, and it may be amended at any time.

About this policy

The purpose of this policy is to:

- Set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- Provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

Responsibility for the policy

- The Director of HR or Chief Operating Officer has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The Risk and Compliance Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed on a continuous basis to the Risk and Compliance Manager.

Your responsibilities and how to raise a concern

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or with whom we have a contractual relationship, either paid or unpaid. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Risk and Compliance Manager as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or report it in accordance with our Whistleblowing Policy as soon as possible

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you should consult the Risk and Compliance Manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion that there have been violations to this policy, as established in RUSI's Whistleblowing Policy.

Training and communication

Training on this policy, and on the risks our business faces in relation to modern slavery throughout its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship and will be reinforced as appropriate thereafter.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy, without there being grounds for compensation.

Version control

Author	First drafted	Approval date and approving body	Latest update
Constance Ekpenyong and Andrea Plazas	26/10/2022	15/12/2022 – Approved by Senior Management	15/12/2022