

Rungway's Employment Standards and Anti Slavery Policy

Updated 1.Jan.2020

Purpose

Rungway believes that business should be conducted honestly, fairly and with respect for people, their dignity and their rights.

We strive to comply with all relevant employment laws and regulations in each country in which we operate. Beyond that, we aspire to match the best employment practices in the country concerned.

Rungway strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains.

Rungway expects that our suppliers will adhere to and hold their own suppliers to the same high standards.

Objective

Modern Slavery and Human Trafficking Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Responsibility

The Board is responsible for this policy.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Frequency

This policy should be applied at all times.

Procedure

Rungway is a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf.



- Employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We engage with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking. Consistent with our risk based approach we may require: employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct. Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct. If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Regulatory / Legal

Modern Slavery Act 2015