

Anti-Slavery & Human Trafficking Policy

1. Introduction

- 1.1 This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Rhythmic Skills' slavery and human trafficking statement.
- 1.2 Rhythmic Skills is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services. This statement sets out the preventative steps that the Company is taking (and intends to take) to avoid the risk of modern slavery occurring within our services.

2. Due Diligence processes

- 2.1 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of Company services, Rhythmic Skills will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors). These processes will be subject to on-going assessment and review.

2.2 Rhythmic Skills has in place systems to:

- Identify and assess the potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Protect whistle blowers.

2.3 Rhythmic Skills identifies the following as the principal areas of potential risk:

- Supply Chains for goods and services - particularly IT equipment and uniforms; outsourced cleaning and security services
- Recruitment agencies for temporary staff

• Supply chains

3.1 In its supply chains, Rhythmic Skills has identified the following business areas as carrying material risks of modern slavery occurring:

- IT equipment
- Clothing and uniforms
- Outsourced cleaning
- Outsourced security services

3.2 When tendering any types of goods or services, Rhythmic Skills requires any potential third-party suppliers to evidence that they operate a high level of corporate social

responsibility and comply with the Modern Slavery Act 2015 during any tendering and selection process, including through contracting with suppliers from approved procurement frameworks.

- 3.3 When procuring any types of goods or services identified as carrying material risks of modern slavery occurring (4.1) the Company requires any supplier to evidence that that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015.
- 3.4 Any supplier or potential supplier, identified in 4.2 or 4.3, wishing to supply to or partner with Rhythmic Skills that does not comply with the Modern Slavery Act 2015, or Rhythmic Skills' own policies and procedures, will be removed from Rhythmic Skills list of suppliers and will not be considered for future supply to the Company unless they can demonstrate that these compliance requirements are met.
- 3.5 In terms of future steps, Rhythmic Skills will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products

4. Training

- 4.1 To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff responsible for recruitment, procurement and contract management. We also require our business partners to provide training to their staff and suppliers and providers.

5. Recruitment practices

- 5.1 Temporary staff and staff recruited indirectly by Rhythmic Skills are recruited through agreed, reputable recruitment agencies. To mitigate the risk of any potential occurrences of modern slavery, Rhythmic Skills conducts checks on such agencies before they are approved.
- 5.2 Through its recruitment processes, Rhythmic Skills ensures that all approved recruitment agencies conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

6. Company policies

- 6.1 Rhythmic Skills already implements the following policies, which embed good practice and providing remedies for individuals concerned about any potential instances of modern slavery in any part of Company business. Rhythmic Skills operates the following policies:

Employee Code of Conduct - this code sets out the actions and behaviour expected of them whilst employed by Rhythmic Skills The Company strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain

Anti-bribery and corruption policy - Rhythmic Skills is committed to the highest standards of ethical conduct and integrity in its business activities. Rhythmic Skills will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf

Procurement policy - this policy reflects Rhythmic Skills' commitment to acting ethically and with integrity in its business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls.

Recruitment policy- this policy ensures that Rhythmic Skills follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

7. Performance indicators

7.1 Where Rhythmic Skills has identified risks of modern slavery occurring in any part of its services, it will aim to introduce performance indicators (KPI) to measure progress against reducing such risks. The Company will consider setting and reviewing KPI in the following contexts:

- use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery
- assessment of third-party suppliers of relevant goods and services and their supply chains

7.2 This statement will be made available to all staff members, stakeholders, and the general public. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

7.3 Having assessed the training needs for all staff operating in the company, Rhythmic Skills will look at devising and implementing training and awareness- raising methods attuned to relevant staffing groups. Training courses may be devised in cooperation with external, specialist training providers.

Document Review Plans


This document is subject to a scheduled annual review. Updates shall be made in accordance with business requirements and changes

Grievance and Whistleblowing policies

These policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

This policy has been approved & authorised by:

Rhythmic Skills UK

Name:	Tulip Sultana	Position:	Managing Director
Signature:		Date:	04.01.2024