

New Red Planet: Modern Slavery & Human Trafficking Policy

Policy Statement

This policy applies to those working for New Red Planet in any capacity, including employees at all levels, directors, officers, agency workers, agents, contractors and suppliers.

New Red Planet prohibits the use of modern slavery and human trafficking in our operations and supply chain. We expect that our suppliers will hold their own suppliers to the same standards.

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.

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

Supplier Adherence

- 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. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging 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 whether to write to suppliers requiring them to comply with the standards identified in this Policy.

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 this Policy.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to this Policy.
- 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 in this regard.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we consider and take appropriate action.

Internal training and procedures

To ensure a high level of understanding regarding the risks of modern slavery and human trafficking we provide training to our staff and have a number of internal policies. These include, but are not limited to:

- Anti bribery
- Whistleblowing
- Ethical Trading

Our staff are encouraged to identify any suspicious behaviour in breach of the Modern Slavery Act 2015.

New Red Planet continue to risk assess the business, particularly those aspects at risk of being used for modern slavery, including regarding NMW/NLW.

New Red Planet makes this statement pursuant to section 54 of the Modern Slavery Act 2015.

Signed: 

Phil Whelan: Director, New Red Planet

Date: Sep 2025

Date of Review: Sep 2027