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Modern Slavery and Human Trafficking Statement for the Financial Year 2019

Introduction

r2c Online Limited understands the importance of conducting our business ethically and we place the same expectations on our supply chain.

This statement is made on behalf of r2c Online Limited, pursuant to section 54 of the Modern Slavery Act 2015 (“Act”) and sets out the steps we are taking to eliminate modern slavery from within our operations and supply chain.

We seek to reassure our customers, partners, investors and employees that modern slavery, including forced labour and human trafficking, has not unknowingly found its way into our supply chains. This statement is reviewed and, where necessary, updated prior to each new financial year demonstrating r2c Online Limited’s continuing commitment to our obligations under the Act.

Our Business

r2c Online Limited is one of five UK based affiliated businesses owned by FLEETCOR UK Acquisition Limited which operates as a subsidiary of FLEETCOR Technologies, Inc.

r2c Online Limited operates out of its offices based in Sheffield – 2 Vantage Drive, Sheffield S9 1RG and has approximately 50 staff members.

Our approach to Modern Slavery and Human Trafficking

r2c Online Limited is committed to adhering to and complying with the Act and does not knowingly employ or condone the use of forced labour, including child labour or bonded labour.

Recruiting of new employees includes identity and right to work checks to ensure potential employees are identified effectively and appropriately using official forms of identification. These background checks form the basis of r2c Online Limited being able to make an offer of employment to individuals who are successful during the interview process. r2c Online Limited recruits for full-time, part-time, temporary and fixed term positions.

Temporary workers are utilised within the business during periods of increased workload. However, all employees are on boarded into the business using the same defined policy and process as permanent employees and contractors.

Currently, r2c Online Limited does not provide standalone modern slavery training or related materials to its employees. It is anticipated r2c Online Limited will adopt a number of supporting policy documents resulting from the FLEETCOR acquisition completed in early 2019. r2c currently adhere to their own, existing policies and procedures however, it is anticipated r2c will adopt FLEETCOR policies, which will bring them in line with the rest of the UK employee population demonstrating a consistent and standardised approach. These documents highlight the company’s approach and expected standards to the areas listed below; the policies include but are not limited to:



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- Responsibility and Sustainability Policy
- Code of Business Conduct and Ethics
- Whistleblowing Policy

An employee handbook is provided to all staff as part of the on boarding process and refreshed annually, which includes a formal assessment to demonstrate understanding.

Through our whistleblowing policy staff have the opportunity to report any unethical or illegal behaviours, such as modern slavery, through anonymous reporting to our Financial Director who maintains responsibility for investigating concerns raised by employees. Employees are aware they can also report concerns through their line manager if not appropriate to report via the Financial Director. All reports submitted will be investigated. We have had no concerns raised by our employees regarding modern slavery throughout 2018.

Due Diligence

The nature of our business is such that our supply chains are short and all of our products or raw materials are procured from reputable suppliers within the UK. We do not procure goods or services from higher-risk countries.

r2c Online Limited has taken the opportunity, presented through the creation of this statement, to review existing wording inserted into supplier contracts. r2c Online Limited continues to review its high-risk supplier contracts and where appropriate and deemed necessary, contractual provisions continue to be updated.

Risk Management/ Risk assessment

The nature of our business and our supply chain (provision of services rather than manufacturing products) is a relatively simple model, which allows us to assess the risk of potential modern slavery offences taking place as low. However, r2c Online Limited remains committed to ensuring modern slavery does not find a way into any existing, or future, supply chain relationships. The r2c Online Limited business is supported by legal and compliance teams and are responsible for agreeing acceptable contractual wording and the insertion of our expectations and standards into written agreements where the potential for modern slavery risk is identified.

Key Performance Indicators (KPIs)

r2c Online Limited does not currently consider its suppliers to be vulnerable to pressures around service level agreements, pricing and cost reduction. However, we remain mindful of how these areas, amongst others, can leave a business vulnerable to the risks of modern slavery, and we continue to monitor the impact of service level agreements on our suppliers. Whilst not identifying the need for KPIs to monitor performance we are committed to regularly monitoring and reviewing our supply chain to ensure our assessment remains valid.



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Summary

Modern slavery, human trafficking and forced labour continue to be one of the great human rights issues of our time. With thousands of victims of this despicable crime throughout the UK alone, it is critical that businesses act responsibly and work collaboratively to support the aspiration of eradicating this criminal activity from our society. r2c Online Limited remains committed to evidencing its ongoing compliance with its obligations in relation to modern slavery and will continue to monitor practices and policies to identify areas where improvements should be made.

A handwritten signature in black ink, appearing to read 'Paul Waterhouse'.

Paul Waterhouse

Director

r2c Online Limited