

## Introduction

The TCL Group of companies are committed to providing professional services and products. These services are focused and delivered to the highest levels through an effective Management Systems. Success depends on the reputation of our product in the marketplace, we therefore place great importance on ensuring a core focus on our corporate and social responsibility.

To ensure compliance with the 'Modern Slavery Act 2015' (The Act), the group have adopted a zero-tolerance approach to modern slavery and human trafficking. The group not only has a statutory duty but also a moral obligation to protect those who maybe affected. The group will ensure it acts ethically, with integrity and with full transparency with all its operations and business activity within the group.

## Our Policies

The group have internal policies that ensure the group is operating both ethically and with transparency. Its continually reviews its policies, procedures and group structure. This is an essential element of our corporate responsibility and due diligence processes, which are applicable in all contracts and operational requirements. This provides confidence that our business is not at risk from any elements of the Act.

## Recruitment

The group HR are responsible for the management and review of personnel with the group. Personnel are hired through established methods that require interviews, inductions and follow up appraisals. Therefore, training about modern slavery and human trafficking is available to its staff as appropriate and applicable.

The group internal recruitment process will ensure that those individuals whom we employ meet all the legal requirements to work within the United Kingdom of their own free will.

## Risk

The group do not recognise any exposure to this type of activity to date, however the group recognises the risk to the business and as such has policies and processes in place to ensure compliance. Due to the type of work we undertake there is no requirement for the employment of personnel via "gang masters" or for the use of personnel that cannot ensure they can identify their rights to work within the UK and the European Union.

## Suppliers

Under the Act, Part 6 – Sect 54 requirements we have a duty to ensure that our suppliers are meeting compliance with the Act. The group ensures that our preferred suppliers are audited to confirm their processes, practises are compliant and that they have at any time breached the Act. Compliance with the Act forms part of the group contractual arranges with our suppliers. Our supplier groups do not identify as being exposed to this type of activity.

**Training**

The group understand the risk of modern slavery is not static, and we must continually maintain a clear direction on this in the years ahead, with a focus on staff development and awareness, to identify the warning signs on modern slavery.

We will deliver training through a variety of methods including, but not limited to workshops, e-courses and tool box talks.

**Ethics and Human Rights**

We uphold the values of honesty, partnership and fairness and we will operate in a way that safeguards against unfair business practices.

We recognise that governments have a primary responsibility to promote and protect human rights. We will ensure that we follow the guidance and rules of our government in these respects. Through enforcement of this policy with our suppliers and clients we will ensure a consistent approach to human rights. We will strive to build trust, deliver mutual advantage and will not tolerate any direct or indirect human rights abuse.

**Raising Concerns**

If a concern is raised regarding a breach of the Act the group will ensure that, the allegation or concern is properly investigated.

**Statutory Compliance**

This annual statement is mandatory for any business with a turnover >36million, the figure is set by the Secretary of State UK.



**Simon Cashmore**  
Group CEO – TCL Group