



## **Modern Slavery and Human Trafficking Policy Statement**

Modern slavery and Human Trafficking is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by other in order to exploit them for personal or commercial gain.

We at TLJ Group Limited have a zero-tolerance to modern slavery and human trafficking and we are committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our business or in any supply chain.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our suppliers and contractors.

This policy applies to all person working for TLJ Group Limited or on our behalf in any capacity including employees at all levels.

This policy does not form part of any employee's contract of employment and we may amend it at anytime.

The directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all staff employed by TLJ Group Limited comply with it.

The HR Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries regarding it and auditing internal control systems and procedures to ensure they are effective in countering modern slavery and human trafficking. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery and human trafficking in supply chains.

### **Compliance with the policy**

All employees must ensure they read and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify you manager or the HR manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within our supply chain constitutes any of the various forms of modern slavery, raise it with your manager or the HR manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they are mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery or human trafficking may be taking place. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR manager or director. If the matter is not remedied and you are an employee, you should raise it formally using our Grievance Procedure.

### **Communication and Awareness of this policy**

Training on this policy and the risk our business faces from modern slavery and human trafficking in its supply chains, forms part of the induction process for all individuals who are employed by TLJ Group Limited and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery and human trafficking will be communicated to all suppliers and contractors at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

### **This Policy has been approved & authorised by:**

Name: Claire Martin  
Position: HSQE Director

Date: 8<sup>th</sup> July 2020

To be reviewed: July 2021

Signature:

