

	<h1>Modern Slavery Policy (UK)</h1>			No.: TSL-POL-UK-018
				Version: 02
				Date: 17/01/2025
Document Type: Information	Company: TSL	Document Owner: Head of ESG	Document Approver: Group Chief of Staff	Document Classification Public

1.0 Introduction

1.1 This statement is made according to Section 54(1) of the Modern Slavery Act 2015 (the "Act") and is founded on transparency, accountability, and continuous improvement. It sets out TSL Ltd. actions to understand and prevent potential modern slavery risks related to its business and supply chain. Modern slavery is the term used to encompass slavery, forced, compulsory labour and human trafficking of all ages.

TSL prohibits modern slavery in line with the Universal Declaration of Human Rights, the International Labour Organisation (ILO) conventions and the UN's Guiding Principles on Business and Human Rights.

1.2 This policy statement relates to actions and activities during the financial year January 2025 – December 2025. Where relevant, we will also communicate initiatives, actions, and improvements we will take in the next financial period.

2.0 Organisation

2.1 Based in Gerrards Cross, Buckinghamshire, United Kingdom, TSL Ltd is a design and build contractor, delivering turnkey construction projects globally within the food, pharmaceutical, logistics, residential, data centre and high-tech manufacturing sectors. Group activities cover civil engineering, earthworks, remediation, industrial builds, residential builds, commercial builds, fit out and the installation of specialist equipment.

2.2 TSL recognises that construction is one of the economic sectors most prone to labour exploitation. Furthermore, the sector relies heavily on outsourcing and subcontracting, often reducing the transparency of operations and the origins of labour. We, therefore, recognise that our activities are at high risk of modern slavery and accordingly adjust our action and mitigation appropriately.

2.3 TSL supports a number of charities that provide safehouses and support in the community for survivors of trafficking and modern slavery. TSL particularly focuses on working with individuals, communities, businesses, and governments to drive permanent change.

Collaboration is vital to develop advanced, creative ways to stay ahead and reduce the exploitation of workers. TSL is committed to working with its peers to share information, drive change and ultimately stop and prevent the exploitation of workers within the construction industry.

3.0 Supply Chain

3.1 The TSL partner with a diverse range of subcontractors and suppliers to fulfil contractual arrangements. The supply chain is complex (typical of the construction industry) and can involve several tiers between the source of raw materials and labour and construction activity on site.

TSL recognize the importance of working collaboratively with supply chain partners to combat and eliminate all forms of modern slavery. By engaging in open dialogue, conducting regular assessments, and implementing robust monitoring mechanisms, TSL aim to ensure that all workers are treated with dignity and respect.

TSL actively encourage suppliers to share the commitment to eradicating modern slavery. The company will share its resources and knowledge with its supply chain in pursuit of this commitment. Only together can the industry make a meaningful impact and contribute to a world free from modern slavery.

4.0 Responsibility

4.1 Responsibility for the organisation's anti-slavery initiatives is as follows.

- **Policies:** The Head of Environment, Social Governance and Head of Human Resources ensure an appropriate and effectively implemented modern-day slavery policy. They will consult with internal stakeholders in the policy preparation and ensure the Board of Directors is effectively trained on and aware of policy contents at each review.

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- Risk Assessments:** Risk assessments are conducted during supplier approval, evaluation, and on-site supplier inspections. Trained parties are responsible for conducting the assessments, and should there be any findings of concern, these can be escalated to the second-line assurance.
- Investigations / Due Diligence:** Second-line assurance is provided by the Head of Environment Social Governance and Head of Human Resources. Escalations, in the first instance, will be managed by these individuals, who will then review circumstances and coordinate internal or external investigations with the consent of the Board of Directors.
- Training:** The Head of Environment Social Governance and Head of Human Resources are responsible for identifying and setting training requirements on modern-day slavery. The Board of Directors are accountable for ensuring appropriate resources are available to train employees.

Strategy: The Head of Environment Social Governance leads an ESG steering group formed of employees across the breadth and depth of the business. This group reviews and sets strategies to improve TSLs' performance across all ESG criteria, including human rights / modern slavery.

5.0 Policies

5.1 TSL operates the following policies that cumulatively describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Speak Out Policy

TSL encourages all its workers, customers, and other business partners to report any concerns related to the organisation's direct activities or supply chains. This includes any circumstances that may increase the risk of slavery or human trafficking.

The escalation process is designed to make it easy for workers to disclose without fear of retaliation. Employees, customers, or others with concerns can use our confidential service or contact our ethics line.

Employee Code of Conduct

TSL's code clarifies to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating internationally and managing its supply chain.

Supplier Code of Conduct

TSL is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers must demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

TSL works with suppliers to ensure they meet the code's standards and improve workers' working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.

6.0 Risk Assessment

6.1 In identifying the risk that modern slavery poses to our business we have reviewed the following industry publications.

- Chartered Institute of Building (CIOB) Construction and the Modern Slavery Act: Tackling Exploitation in the UK, 2018
- Chartered Institute of Building (CIOB) Building a Fairer System, 2016

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

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- A generic risk assessment for the organisation is kept up to date to inform internal parties on activities or supply chain parties that are of material importance to conduct due diligence.
- Supply chain party-specific risk assessments will be conducted at desktop and face-to-face on-site to identify and understand risk. These will be shown as part of the TSL due-diligence process.
- Risk assessment categories will range from "Low", "Medium", and "High."

7.0 Due Diligence & Supplier Reviews

7.1 TSL undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and risk reviews include.

7.2 Desk Based

Mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking

Evaluating the modern slavery and human trafficking risks of each new supplier based on their declarations made in a PQQ / approval process.

Creating an annual risk profile for each supplier based on information submitting during annual reviews

Conducting desk-based interviews and audits on suppliers should there be cause for concern or as part of an improvement plan.

Site Based

Announced / planned on-site supplier audits in accordance with a programme that focuses on the high-risk suppliers (as informed by the desk-based assessment).

Where there is cause for concern unannounced on-site inspections may be conducted. This may include monitoring visits as established under an improvement plan.

Action

Should a supplier fail or looks to fail a TSL or legal requirement on modern slavery the following actions may be taken.

Knowledge & Skills

For light offences or lack of proactive action from TSL suppliers in the first instance the focus will be on knowledge sharing and training of the supplier on modern slavery. The construction site team working with the supplier are responsible for ensuring the supplier completes training and awareness requirements.

Improvement Plan

Where a supplier makes no effort or does not improve to the quality required following re-training TSL shall agree an improvement plan with the supplier. The ethics lead for TSL (Head of ESG) shall be responsible for writing, agreeing, and monitoring outcomes of the plan with the supplier.

Termination & Reporting

TSL shall invoke sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate any modern slavery or supplier code of conduct TSL standard. This can include the termination of the business relationship and reporting of the supplier. The TSL board are responsible for the decisions relating to termination and reporting.

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8.0 Performance

8.1 In the past 12 months, TSL has kicked off a refreshed focus on modern slavery as part of developing the company's ESG strategy. Furthermore, the company has recruited an experienced Head of ESG responsible for leading on ethics/governance and holistically improving our effectiveness and understanding of performance.

As part of the ESG strategy launch in early 2025, new modern slavery KPIs will be agreed upon with the board. TSL envisage these KPIs will be linked to measuring training and inspection.

9.0 Training

9.1 TSL requires the following

- All staff are to read and agree to the modern slavery policy on an annual basis
- All parties in a position of compliance, leadership, and people management to complete advanced modern slavery training

The organisation's advanced modern slavery training course includes.

- How to assess the risk of slavery and human trafficking concerning various aspects of the business, including available resources and support.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- What messages, business incentives, or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

10.0 Awareness

10.1 As well as training staff, TSL raises awareness of modern slavery issues through electronic and hard-copy communications.

The communications explain to staff.

- the basic principles of the Modern Slavery Act 2015.
- how employers can identify and prevent slavery and human trafficking.
- what employees and supply chain parties can do to flag up potential slavery or human trafficking issues to the relevant parties within TSL

Elements of our supply chain are encouraged to subscribe to classroom and e-Learning modules run by the Supply Chain Sustainability School, which includes content relating to modern slavery and human trafficking.

11.0 Certification

11.1 TSL suppliers must certify that products comply with purchase agreements and/or purchase order terms and conditions. These purchase agreements and/or purchase order terms and conditions require suppliers to represent and warrant compliance with the TSL policy and all applicable laws, regulations, and international standards.

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12.0 Reporting & Compliance

12.1 TSL prohibits any member of the organisation or supply chain from retaliating against any person who, in good faith, raises concerns about a possible violation or issue relating to modern slavery or human rights.

In the first instance, TSL encourages parties to report concerns to their line manager. TSL also provides additional support for reporting via ethics to the Head of ESG and Head of HR via the email ethicsreporting@tslprojects.com, which is routinely monitored.

TSL will work in partnership with the Gangmasters and Labour Abuse Authority and all suppliers to tackle and combat the threat of modern slavery and human trafficking across the construction industry and throughout our supply chain in accordance with international environmental, social, and ethical standards.

TSL requires its employees and contingent workers to comply with this policy, which forbids human trafficking and references TSL's Human Rights Principles. An employee's policy violation may result in discipline, including termination and reporting the misconduct to the relevant government authorities.

13.0 Review

This policy is reviewed to ensure its ongoing suitability, as and when there are key changes (e.g., in customer, legislative, operational requirements etc.) and annually as a minimum. The board of Directors endorse this policy and shall ensure that it is implemented and communicated accordingly.

Approved By

Chris Reilly

Chris Reilly
Group Chief of Staff