

# Modern Slavery Act 2015: Anti-Slavery and Human Trafficking Policy

## POLICY STATEMENT

Modern slavery is a crime and an abuse of human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the removal of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings.

As part of our culture of good governance for good business, we operate to a set of core values which reflect our relationships with principal stakeholders, customers and suppliers. We adopt an ethical and transparent behavioural attitude for all business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly, the offences under the Modern Slavery Act 2015.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means. We demand the same attitude of all our employees. We expect our suppliers to have the same ethical values and for them to have the same culture of good governance with their own suppliers.

This policy applies to everyone working for us or on our behalf in any capacity, including employees at all levels, directors, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

All new employees are given an awareness of modern slavery, human trafficking and related issues as part of our induction process. Further training is provided as necessary, concentrated on those managers and members of staff who are involved with areas of our supply chain which are deemed to be higher risk. Because of the recent pandemic, the board anticipates that awareness and training programmes regarding modern slavery and human trafficking will continue to be refined and expanded in 2023 and beyond.

## RESPONSIBILITY FOR THE POLICY

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 in our supply chains.

## COMPLIANCE WITH THE POLICY

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. We expect all with whom we have business dealings to ensure their own policies and procedures are adequate and are used to help us prevent acts which are offences under the Modern Slavery Act 2015.

We write to all our lenders, suppliers, contractors and business partners including a link to our up-to-date policy and a contact e-mail address.

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

Employees are asked to notify their manager as soon as possible if they believe or suspect that a breach of this policy has occurred or may occur in the future, in accordance with our Whistleblowing policy.

The Whistleblowing policy is intended to provide guidance on how concerns can be communicated to us about suspected modern slavery associated with our business and our supply chain. The Whistleblowing Procedure applies to all employees.

If employees are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitute any of the various forms of modern slavery, they are asked to raise this with their manager or anonymously to [speakup@tradecentregroup.co.uk](mailto:speakup@tradecentregroup.co.uk)

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if the concerns or suspicions they raise turn out to be mistaken.

### Approval

This Anti-Slavery and Human Trafficking policy has been formally approved by the Directors of TTCG for 2022-2023.

*Andy Coulthurst*

**Andy Coulthurst**  
**CEO**

**The Trade Centre Group PLC**  
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