

## ANTI-SLAVERY & HUMAN TRAFFICKING POLICY – VERSION 4.0

### Document Attributes

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Anti-Slavery &amp; Human Trafficking Policy

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Commercial Director

**Date of Approval**

Feb 17

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Unclassified

### Change History

Version	Date of Revision	Approved by	Change and Reference
V3	1/11/2021	MH	Review & Update Of Policy
V4	11/1/2023	MH	Update to responsibilities

## ANTI SLAVERY & HUMAN TRAFFICKING POLICY

### Company Statement

TMO Traffic Highways Ltd ('the Company') is committed to social and environmental policy and has zero tolerance for slavery and human trafficking. The Company operates around the UK sourcing supplies from a limited range of national suppliers, which are all assessed through our supply chain policy. The Company respects human rights within our sphere of influence. We will not tolerate the use of forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery or the trafficking of persons.

#### 1. Overview and how we define Modern Slavery

1.1 Slavery, child labour and human trafficking are serious crimes and a violation of fundamental human rights. There are various forms of this 'Modern Slavery' which deprives victims of their liberty and usually involves financial exploitation.

1.2 At TMO Highways we conduct our business fairly, ethically and with respect to fundamental human rights. We are fully committed to the prevention of all forms of slavery, forced labour or servitude, child labour and human-trafficking, both in our business and in our supply chains. We will not tolerate it.

1.3 This policy does not form part of your contract of employment, and we reserve the right to amend this policy at any time.

1.4 You are required to read and comply with this policy if you work for, or on behalf of the Company in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider.

1.5 The company directors are responsible for this policy.

1.6 Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between you and the Company. It could also involve other legal steps being taken against you including notification to authorities.

#### 2. Preventing slavery and human-trafficking in our business & high risk area

2.1 The Company makes appropriate checks on all employees, recruitment agencies and suppliers, to know who is working for, or on behalf of us. This is done through our approved suppliers list.

2.2 The Company provides every employee with a written contract of employment. We pay every employee in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays.

2.3 All employees receive a copy of this policy and this is available on our Bright HR portal. The companies management team are provided with guidance and training on this policy. To ensure the company operates within the parameters of the policy at all times.

2.4 The biggest area of risk to the business in regards to modern slavery would be through the use of any agency staff in the event of additional operative power needed. However TMOH combat this through eligibility to work in the UK checks, working hours checks and rest day checks. Any agency supplier also has to prove their slavery policy through the approved supplier scheme run by TMOH.

2.5 The performance of our supply chain is assessed within our Management Review meetings, any issue with Slavery would be included in these discussions, but would be dealt with at source if any issues were to arise.

### 3. If you are one of our Suppliers

3.1 If you supply the Company with goods or services, you must assess your own business and supply chains and confirm that you comply with your legal obligations, in relation to Modern Slavery, and are committed to ensuring there is no slavery, forced labour or servitude, child labour or human trafficking taking place in your business, or any of your own supply chains. You must also provide a copy of your anti-slavery policy, this will form part of TMO Highways approved supplier process.

3.2 If you breach this policy, or are found to have slavery or human-trafficking within your business, or knowingly in your supply chain, the Company may remove you from our approved supplier list of companies and will have a right to pursue its legal remedies against you.

### 4. If you are an Employee or Worker providing services for us

4.1 You must immediately report any suspicions of Modern Slavery or human-trafficking in our business or supply chains to our Directors or Senior Management Team. Our Senior Management Team will investigate and report to our Board of Directors, within a reasonable time, on actions which may be required to be taken.

4.2 You will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If you believe that you have suffered any such treatment, you should immediately inform our Senior Management Team and if you are an employee, refer to our Grievance and Whistleblowing Policies.

**Signed:**



<b>Printed Name:</b>	<b>Mark Haysman</b>
<b>Job Title</b>	<b>Commercial &amp; Business Director</b>
<b>Date:</b>	<b>11<sup>th</sup> January 2023</b>
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