
ANTI-SLAVERY AND HUMAN TRAFFICKING

POLICY

Human trafficking is the acquisition of people by improper means such as force, fraud or deception, with the aim of exploiting them. It is a complex problem brought about by inter-related economic, social, cultural, political and personal factors.

TMS Ltd understands that the construction industry is an industry that may be susceptible to the use of trafficked persons. It understands that those trafficked may be exploited into forced labour and other emerging forms of trafficking including organised begging, benefit fraud, domestic servitude and forced marriage. This is modern day slavery.

TMS is committed to opposing modern slavery in all its forms and aims to ensure that it is neither condoned nor permitted to occur in any part of our business activities or supply chains. TMS has a zero tolerance approach to this matter and is committed to transparency within our business activities, employing processes of verification to establish that this unlawful practice does not occur within our business or with those whom we conduct our business activities.

The UN Palermo Protocol definition is globally accepted as:

“Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs”.

As well as directly employing individuals and sub-contractors alike, TMS has also spent many years developing relationships with a wide range of organisations within its supply chain and is therefore conscious of the potential risk of unknowingly being exposed to the unlawful practice of modern slavery or human trafficking. As a direct result of the introduction of the Modern Slavery Act 2015, TMS have reviewed their existing Compliance and Risk Management processes in order to determine any additional measures that may be required in order to prevent slavery and human trafficking taking place in any part of the business or as far as practicable our supply chains.

We have developed a Policy which clearly sets out our position on this matter and which is integral to all TMS business processes, the conduct of all persons or organisations with whom TMS contracts directly, indirectly or any person or body that we may appoint to act on our behalf.

All team members are required to familiarise themselves with procedures devised to identify and prevent the occurrence of modern slavery within our business practices. All team members are required to conduct their business activities in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains.

In order to facilitate compliance with this Policy, we have implemented the following:

- Risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery/human trafficking so that efforts can be focused on those areas;
- Engagement with our suppliers to (a) convey our Anti-Slavery Policy and (b) to gain an understanding of the measures taken by those suppliers to ensure that modern slavery does not occur within their business;
- Introduction of supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- Introduction of contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

Processes to Combat Trafficking and Slavery with direct employees:

We are committed to providing our staff with a salary which at least meets the National Living Wage and offering the required statutory leave entitlement. Furthermore, we ensure all staff have provided their National Insurance Number, or Working Visa if they are not British nationals, prior to their employment and TMS ensures that it performs the necessary checks to determine an individual's eligibility to work in the UK.

Ensuring Standards in our Supply Chain

TMS requires all suppliers and sub-contractors to complete a Pre-screening Questionnaire. The answers from this provide TMS with sufficient information to ensure confidence that the supplier and supply chain upholds and adheres to current legislation as well as the principles and business values upheld by TMS. If a supplier does not comply, TMS will cease to conduct business with that supplier.

Identifiable Areas of Concern in our Industry

TMS understands that the construction industry attracts a workforce from diverse nationalities and that in the UK, we are able to utilise the skills of employees from across the world, particularly Europe. Whilst the benefit of this influx of workers allows for competitive market, it also has the risk of potential exploitation. By checking National Insurance details and Passports or Working Visa's TMS ensures that employees and subcontractors are legally eligible to work in the UK, and that their salary will be monitored by HMRC. The Pre-Screening Questionnaire used for vetting our supply chain will inform us that the businesses with whom we conduct our operations with have taken equivalent steps.

Responsibility For The Policy

Responsibility for preventative action against the occurrence of modern slavery or human trafficking within TMS rests with the Company's leadership. The board of directors of the Company has overall responsibility for this Policy and for ensuring that its implementation complies with our legal and ethical obligations. Team leaders at all levels are responsible for ensuring that those reporting to them understand and comply with this Policy and are given adequate training on both the Policy and the issue of modern slavery and human trafficking as a whole.

Actions For Reporting Modern Slavery Or Human Trafficking

Any team member concerned about this matter in any regard should approach their Line Manager, in the first instance, who will then refer the matter to a member of the Management Team or QSHE Director, who will deal with the matter accordingly.

Safeguards

We aim to encourage openness and support any person who raises genuine concerns in good faith under this policy. We are committed to ensuring that no person suffers any detrimental treatment as a result of reporting their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

TMS will also accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Communication Of This Policy

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

Review

This Anti-Slavery and Human Trafficking Policy will be reviewed by the Company's Board of Directors on a regular basis and may be amended from time to time.

Signed:
P. Stenner



CEO

Signed:
R. Taffs



QHSE Director

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Review Date: October 2025