

## **Modern Slavery Policy**

This document outlines our organisation Modern Slavery policy.

Statement Authorised By: Managing Director	Mr Rory Gaskin
Reviewed on / Next Review Due:	12/09/2023 / 12/09/2024

### **Introduction**

TLC takes its responsibilities very seriously with regard to the Modern Slavery Act 2015. This statement sets out the approach taken by the company to understand all potential modern slavery risks related to its business and the actions undertaken to mitigate any such risks.

### **Statement on Slavery and Human Trafficking**

TLC has a zero-tolerance approach to any form of mistreatment of people and is committed to operating and conducting its business in such a way that human rights are respected and protected. We will not permit or condone any form of slavery, servitude, forced or compulsory labour or human trafficking. We recognise that our business has a role to play in managing this issue and we are firmly committed to working to identify and eradicate modern slavery practices from our operation and supply chains, to the extent that they might exist.

All staff must read our full Policies and Procedures during their induction and on an annual basis and answer a set of questions to check for understanding.

The key policies that support this Modern Slavery Policy are:

- [Whistleblowing Policy](#)
- [Safer Recruitment Policy](#)
- [Code of Conduct](#)

As part of our ongoing commitment to eradicating modern slavery from all aspects of our business and supply chains, we have identified the key areas that pose the highest risk. The below areas are not exclusively the only areas of risk; however, they pose the highest risk due to the volume and nature of the areas. These are:

- The recruitment of staff
- The purchase of goods that TLC offers to its member as part of the Reward and Recognition scheme.

## **Responding to these Risks**

### **Recruitment**

We operate a robust recruitment and employment process. We embrace principles supportive of equal treatment without unlawful discrimination and with the preception of employment law for all our employees. We treat all staff equally, without unlawful discrimination and with respect for their human rights as per the Human Rights Act 1998.

TLC is legally required to undertake certain basic documentation checks on every potential employee to avoid employing illegal workers. This policy applies to all new employees of the Company, irrespective of their national origin. Before any individual of any nationality starts work for the Company, it is obligatory that they can prove eligibility to work in the UK.

### **Document Checks**

To ensure that all employees are eligible to work in the UK, TLC will ensure that for all new staff, the following must be done:

- The new staff members must show proof of eligibility to work in the UK with original documents
- The original documents that prove eligibility must be checked with the new staff members present
- Copies of the documents will be held on our secure employee database
- The date the documents were uploaded and verified on our internal systems will be recorded

### **Supplier adherence of the values**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. Department Leads are responsible for compliance in their respective areas and departments and for their supply relationships in relation to the monitoring and enforcement of our internal policies and values.

### **Purchasing of Goods**

We encourage our suppliers to endorse such principles to demonstrate their opposition to human tracking and modern slavery. We have communicated with our key suppliers and have obtained their modern day slavery policies to ensure that their internal processes are meeting the high standards that we expect. Where a supplier fails to meet their own policy and our own high standards, we request a full response to the reasons for the failing; and if not suitable or future failings happen, terminating the contract is the final option.

### **Due Diligence Processes for Slavery and Human Tracking**

We have in place a policy to protect whistleblowers who highlight to us any risk of slavery or human trafficking within our business. We will continue to review all aspects of this policy and publish an updated version on an annual basis. All employees are required to read our full policy document on

an annual basis and answer questions relating to the policies to ensure all employees understand their role.