

## TERRY GROUP LTD

DOCUMENT: TG07-CSR-002-D Modern Slavery & Anti-Human Trafficking Policy

LAST REVIEW DATE: 24/04/2022

RELEASED: 17/07/2023

# **Anti-Modern Slavery and Human Trafficking Policy**

## Modern Slavery Act 2015.

An Act to make provision about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims; to make provision for an Independent Anti-slavery Commissioner; and for connected purposes.

## Introduction

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

This Policy takes into account and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.

This policy sets out Terry Group Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Terry Group Ltd maintains relationships with many different organisations in its supply chain, as well as directly employing people. In the light of the general law on employment and human rights and more specifically, the Modern Slavery Act 2015, the Group is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chain is free from slavery and human trafficking.

## Organisational Structure and Supply Chains

This policy covers all the activities of Terry Group Ltd. It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with Terry Group Ltd to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with our anti-slavery policy.

## Responsibility

HR will liaise with other relevant departments to ensure that risk analysis and investigations/due diligence in relation to modern slavery and human trafficking is carried out as required.

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HR will ensure that employees are given adequate and regular training on the issue of modern slavery so that everyone understands and complies with this policy.

### Relevant Policies and Practices

Terry Group Ltd operates the following policies and practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

Terry Group Ltd's policy on whistleblowing encourages all its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the Group's Whistleblowing Policy which is available on the Company intranet. The nature of the complaint will determine the Group's next course of action.

We endeavour to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour and we carry out appropriate background checks. Personnel responsible for the recruitment activities in any of the subsidiaries are advised to adhere to this policy by ensuring that strict verification of potential employee's right to work is carried out before any offer of employment is made.

Terry Group Ltd expects all supply chain to adhere to recruitment practices that ensure that all terms of employment are voluntary. Where necessary and if required, we may request demonstration of compliance with this policy.

### Awareness & Performance Indicators

As well as training employees, Terry Group Ltd will raise awareness of modern slavery issues by communicating our anti-slavery and human trafficking policy to all employees. We expect employees to refer to this policy and understand what is required of them in relation to modern slavery.

This policy on modern slavery will be communicated to all suppliers, contractors and business partners at appropriate points during our business relationship with them and reinforced as appropriate thereafter.

Signed:



David C Allen  
Managing Director

Dated:

18<sup>th</sup> July 2023