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	MODERN SLAVERY & HUMAN TRAFFICKING POLICY	

Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people worldwide, including many in developed countries, who are being kept and exploited in various forms of slavery.

Every company is at risk of being involved in this crime through its operations and its supply chain. At TES, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain. This statement sets out the concrete steps and actions that we have taken to understand all potential modern slavery risks related to our business and implement measures to prevent slavery and human trafficking.

Our business and supply chains

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety, and environmental standards, and references.

When we are made aware of any non-conformity related to human trafficking or slavery, we will immediately address it and report it to the authorities.

We have implemented our code of business conduct with all of our suppliers, and we have also developed a Supply Chain Policy, which will be rolled out to all suppliers in 2022.

Risk assessment

Within the next year, we will be conducting a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries based on the Global Slavery Index
- The business services rendered by the suppliers
- The presence of vulnerable demographic groups
- A news analysis and the insights of labour and human rights groups

Policies

TES operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct - our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour in our global and supply chain operations.
- Purchasing Code - we have updated our Purchasing Code and supplier contracts to reference slavery and human trafficking explicitly.

Supplier due diligence

TES conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes:

- Assessing risks in the provision of particular services
- Auditing the suppliers and their health and safety standards, labour relations, and employee contracts
- Requiring improvements to substandard employment practices
- Sanctioning suppliers that fail to improve their performance in line with our requirements

We require all suppliers to attest that:

- They don't use any form of forced, compulsory, or slave labour
- Their employees work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries for any reasons
- They don't require employees to surrender their passports or work permits as a condition of employment

Awareness

TES has raised awareness of modern slavery issues and will make this policy available to all our employees. This will explain:

- Our commitment to the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery Training

In addition to the awareness programme, TES will roll out a new e-learning course to all employees and supplier contacts, which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risk to our organisation
- How employees can identify the signs of slavery and human trafficking, including unrealistically low prices
- How employees should respond if they suspect slavery or human trafficking
- How suppliers can escalate potential slavery or human trafficking issues to the relevant people within their organisation
- What external help is available for the victims of slavery
- What terms and guidance should be provided to suppliers in relation to slavery policies and controls
- What steps TES will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from employees that they will abide by TES's anti-slavery policy

Measuring how we're performing

TES has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- Monitoring how many employees have completed mandatory training?
- Monitoring how many suppliers have filled out our ethics questionnaire?
- Monitoring how many suppliers have rolled out an awareness and training programme that is equivalent to ours?
- Assessing how many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues?

- End of the Policy -

CHANGE HISTORY

Revision No	Description of Amendments	Date of issue
Not Applicable	Initial issue	15 October 2021

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Name:	Susan Gleave	Name:	Jean Cox-Kearns
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