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## Modern Slavery and Human Trafficking Statement

Thyson strongly opposes slavery and human trafficking, and would never knowingly conduct business with organisations, contractors or employees engaged in such practices.

Thyson's commitment to respect in the workplace includes our full support for international efforts to promote ethical principles and practices related to the prevention of the exploitation and abuse associated with modern slavery and human trafficking.

### Legislation

The Modern Slavery Act 2015 (MSA) is ultimately designed to tackle slavery and human trafficking, but a key provision is in the section 54 of the MSA which introduced a requirement for organisations to produce an annual transparency statement.

### Responsibility

The Senior Management Team have overall responsibility for all slavery and human trafficking matters. This policy has been endorsed by the Board of Directors which gives its full support to its implementation. The Senior Management Team continually review the company's resources to ensure that adequate financing, staff, equipment and materials are available to meet the requirements and implementation of this policy.

Managerial and Supervisory staff have responsibility for the implementation of the policy and must ensure that slavery and human trafficking issues are given adequate consideration in the planning and day-to-day supervision of all work.

All employees and sub-contractors are expected to co-operate and assist in the implementation of this policy.

Thyson also expect commitment to these principles from all organisations with which we do business and will not support or do business knowingly involved in slavery or human trafficking.

### Communication

A copy of this statement shall be available upon request and displayed on the company noticeboards. New Supplier Prequalification's (ENG7060) encompass the Thysons 'Statement of Corporate Social Responsibility' (TTLStmt003) this encompasses Thysons Employment & Ethics Policy.

### Assessing and Managing Risks:

Thyson's personnel and sub-contractors shall observe the following practices to assess and manage risks:

- Only interview applicants in an approved location.
- Not allow applicants to complete registration documents on behalf of others.
- Evidence to confirm the applicants 'Right To Work' shall be reviewed and accepted prior to being engaged by Thyson or its sub-contractors.
- Not accept money, favours or any gifts at all from applicants or workers.
- Notify a Manager when informed by an applicant or worker that they have paid money to be introduced to the Company.
- Not allow an unauthorised agent or individual to introduce job applicants to the Company.
- Notify a Manager when suspecting an individual of introducing job applicants to the Company for personal gain.

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- Not act as landlords or be involved in the provision of accommodation, transport or other paid for services to workers (unless contractually stipulated, recorded and approved at Management level).
- Not allow anyone other than an authorised person to choose which workers are selected for work shifts.
- Not force or coerce workers to work against their will.
- Not threaten or subject workers to physical or mental mistreatment.
- Treat applicants and workers with dignity and respect.
- Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a Manager immediately.

### **Ethics Policy:**

Thyson expects that all of its business is conducted in compliance with the highest ethical standards. We apply these standards to all dealings with employees, customers, suppliers and other stakeholders. The company's Ethics Policy has been approved by the Directors and has been developed to ensure that the company's business is conducted in adherence with high ethical and legal principles and sets standards of professionalism and integrity for all employees and operations worldwide.

The following is a summary of the Ethics Policy:

- All employees have the right and responsibility to ensure that Thyson's business is conducted with high ethical and legal principles.
- Our policy is to operate within applicable laws.
- Prevention of child labour, slavery and human trafficking either directly or indirectly via the supply chain.
- Discrimination or harassment of any kind will not be tolerated.
- As a matter of policy, we do not make political donations.
- No bribes shall be given or received.
- Conflicts of interest must be avoided.
- Thyson aim to be a responsible partner within our local communities.
- Employees are encouraged and supported to report, in confidence, any suspected unlawful/improper activity.

### **Performance Indicators**

Thyson's Finance Department shall use the following indicators to measure the effectiveness in ensuring that slavery and human trafficking is not taking place in the business or our supply chains:

- Verifying accuracy of home addresses, and checking if certain addresses are showing a high level of employee/worker occupancy.
- Utilising the BACS Transfer System to check if a number of unrelated workers are being paid into one account.

### **Annual Review**

The operation of this policy and the associated procedures shall be monitored and reviewed annually to ensure that they remain current and applicable to the company's activities.

M. Braddock, Managing Director.



Date: 10/04/18