

Modern Slavery Policy

Overview

At TSP Projects we care for our employees and believe that all people have the right to be treated with respect and paid fairly irrespective of the type of work they do or the country in which they work.

This policy applies to all persons working for us or on our behalf in any capacity at all levels, including directors, employees, agency workers, seconded workers, volunteers, work placements, agents, contractors, external consultants, third-party representatives and business partners.

Policy Principles

Our Commitment

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

TSP Projects has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Supply Chain Considerations

We are committed to ensuring there is transparency in our approach to tackling modern slavery in our business and throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same high standards.

Our Expectations of You

All employees are required to read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or the HR department as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are required to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or through the HR department.

We aim to encourage openness and we are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith 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.

If you believe that you have suffered any such treatment, you should inform the HR department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

If you are found to be in breach of this policy you may be subject to disciplinary action under the company's Disciplinary Policy.

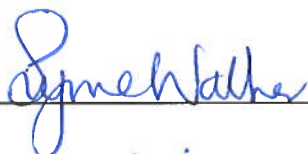
Policy Governance

This policy was reviewed and updated in June 2018.

The Management Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

This policy does not form part of any employee's contract of employment and it may be amended from time to time.

Signed Suzanne Walker
HR DIRECTOR



Date:

