

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

The Modern Slavery Act 2015 requires commercial organisations who carry out business in the UK and have an annual turnover of at least £36 million to publish a modern slavery policy statement.

Whilst TSM Ltd (“the Company”) does not meet that criteria, we are morally committed to ensuring to the best of our ability that there is no modern slavery or human trafficking in either our own business or our supply chain, and also support and comply with our clients’ own efforts to ensure this.

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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.

This Policy applies to all officers, directors and employees, whether permanent or temporary. It also applies to our supply chain, which must ensure that both its business and that of its supply chain worldwide comply with this Policy.

To date we have not been aware of any human trafficking or slavery activities within our supply chain, but we have a zero-tolerance approach, and if any instances come to our attention, we will act promptly in accordance with our legal and moral obligations and notify the relevant authorities of any individual’s or supplier’s contravention of the Modern Slavery Act. Breaches of this Policy are viewed as a serious offence and violations by employees will result in disciplinary action, which may lead to dismissal where appropriate.

All our recruitment activities are carried out in a fair and transparent manner and comply with relevant legislation and standards, including the Immigration, Asylum and Nationality Act, and we expect suppliers and subcontractors to do the same.

All our suppliers and subcontractors are subject to our pre-qualification process, which checks their financial, health, safety, environmental and quality standards and performance. This process also requires that company to commit to preventing slavery and human trafficking and to comply with our own Policy.


Where suppliers, products or materials are coming from outside the UK and EU, or where the supplier is likely to have an annual turnover of at least £36 million, we require them to provide evidence that they have their own Slavery and Human Trafficking Policy and procedures in place.

Our workers, and those of any supplier or subcontractor, have a duty to report any concerns to us if they suspect any slavery or human trafficking activities. Anyone reporting such concerns, as long as their intent is genuine, whether subsequently proven or unfounded, will not be put at a disadvantage for doing so.

Awareness of the subject will be promoted through the display of this Policy on our company noticeboards, awareness briefings to workers on the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it, and its issue to suppliers and contractors.

Our Managing Director has ultimate responsibility for preventing modern slavery within the business.

This Policy will be reviewed annually as part of the management review process, to ensure its continued relevance and adequacy. This Policy is available to interested parties on request.

Signed: 
Position: **Managing Director**
Date: **01/07/2024**
Review Date: **01/07/2025**