



THE ENVIRONMENTAL & PROCESS ENGINEERING GROUP LIMITED (“TEPE Group”)

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

1.0 POLICY STATEMENT

TEPE Group and all its subsidiaries, has a zero-tolerance approach to modern slavery and we are fully committed to preventing slavery or human trafficking in our business and throughout our supply chain, and we will uphold all elements of the Modern Slavery Act 2015. We expect the same high standards from all our sub-contractors, suppliers and other business partners.

Our due diligence process is designed to:

- ensure that our Anti-Slavery and Human Trafficking Policy Statement is understood and is embedded into our business;
- identify, assess and monitor potential risk areas within our business and supply chain;
- reduce the risk of slavery and human trafficking occurring within our business and supply chain.

We have:

- made our employees aware of the Modern Slavery Act 2015, including its definitions of slavery and human trafficking;
- advised employees what to do if they suspect a case of slavery or human trafficking;
- provided appropriate training to key employees in relation to our obligations under the Modern Slavery Act 2015 and this policy statement;
- agreed a process by which we plan to review our suppliers, sub-contractors and business partners in potentially high-risk categories to check what assurance arrangements they have in place. Upon endorsement of this policy it is our intention to conclude this review by the end of March 2019;
- committed to ensuring our business is transparent and as such we will comply with the disclosure obligation under the Modern Slavery Act 2015;
- commenced a revision of the procurement of our contracts and related documents to include prohibitions in respect of anti-slavery and human trafficking and compliance with the regulations, and;
- reviewed our Whistleblowing Policy Statement.

Relationships with our supply chain and business partners have been established over a number of years. The business areas identified as having the most significant potential risk are:

- sub-contractors;
- agency staff;
- project based materials, goods and services.

In these areas we will insist on the following checks:

- for agencies supplying staff we require confirmation that they have complied with the Modern Slavery Act 2015 and obtained proof of eligibility to work, references, qualifications, proof of National Insurance and bank details to ensure each person is acting in their own right;
- for sub-contractor’s completion and return of a sub-contractor pre-qualification questionnaire, which seeks confirmation from the sub-contractor that they are aware of the Modern Slavery Act 2015 and that they have processes in place to ensure that they are not exposed to any risk in this regard;
- for suppliers of project-based materials, goods and services with whom we do regular and repeat business, we require completion and return of a supplier questionnaire which seeks confirmation from the supplier that they are aware of the Modern Slavery and Human Trafficking Act 2015 and that they have processes in place to ensure that they are not exposed to any risk in this regard. Such suppliers will become accredited suppliers;
- we rely on the integrity of the suppliers we use on an ad-hoc basis but consider this a low risk due to the ad-hoc nature and lack of longevity in the relationship; however, should the relationship develop, they would move into the bracket of being an accredited and preferred supplier and will be required to complete a supplier questionnaire.

Other procurement areas are as follows, and are deemed as low risk:

- protective equipment and workwear;
- IT hardware, software and telecommunications;
- vehicles;
- office furniture;
- training services;
- travel services.

2.0 WHO IS COVERED?

This policy statement applies to all employees working at all levels and grades, including directors, other officers of the company, senior managers, employees (whether permanent, fixed term or temporary), consultants, sub-contractors, trainees/apprentices, agency staff or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as “**workers**” in this policy).

3.0 WHAT IS SLAVERY AND HUMAN TRAFFICKING?

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.

4.0 YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of slavery or human trafficking is the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Compliance Manager - Group Finance Director 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 encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business, supply chain or any supplier at the earliest possible stage.

An employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. A copy of our “Disciplinary Rules and Procedures” is in our Employee Handbook. We reserve our right to terminate our contractual relationship with other stakeholders if they breach this policy.

5.0 HOW TO RAISE A CONCERN

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes slavery or human trafficking, or if you have any other queries, these should be raised with the Compliance Manager. Concerns should be reported by following the procedure set out in our Whistleblowing Policy. Our Whistleblowing Policy can be found in the Employee Handbook.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. 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 within our supply chain and suppliers.

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 Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure detailed within our Employee Handbook.

6.0 WHAT DUE DILIGENCE OUR SUPPLIERS ARE REQUIRED TO CARRY OUT

TEPE Group is committed to ensuring that there is no slavery or human trafficking in any part or form within our business and in so far as possible to require our suppliers hold similar ethos. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our Group.

7.0 TRAINING AND COMMUNICATION

Training on this policy forms part of the induction process for all new employees and other workers. All employees will receive training on how to implement and adhere to this policy appropriate to their role.

Our commitment to addressing the issue of modern slavery in our Group and supply chain must be communicated to all suppliers, sub-contractors and business partners as appropriate during our business relationship with them.

8.0 WHO IS RESPONSIBLE FOR THE POLICY?

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

The Compliance Manager has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training.

9.0 MONITORING AND REVIEW

The Compliance Manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering slavery and human trafficking. If any employee, worker, supplier, sub-contractor and business partner is found to be in non-compliance to our policy, we will request a meeting to establish if the non-compliance was being dealt with in a satisfactory way to avoid repetition. Where we deem there is a significant risk we would remove the individuals from our approved and preferred supplier list immediately.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance Manager.

This policy does not form part of any employee’s contract of employment and it may be amended at any time.

In line with our standard procedures, this policy will be reviewed annually.

Signed: Lee Pickering
Chief Executive

Date: 1 October 2018