

## STANDARD OPERATING PROCEDURE

Title: ANTI- SLAVERY & HUMAN TRAFFICKING		Associated Department(s):  <b>All</b>
Department: <b>Human Resources</b>		
Process Owner <b>ROB LLOYD</b>	Signed:	

REVISION HISTORY				
Revision	Description of Change	DCR No.	Author	Effective Date

### 1. Purpose:

The purpose of this procedure is to set out TRB’s commitment to prohibiting the use of Modern Slavery and Human Trafficking in our operations and those of our supply chain, and outlines the actions taken to raise awareness of this issue and safeguard TRB from these practices.

### 2. Scope:

This procedure encompasses TRB employees and all persons working on our behalf in associated companies including suppliers, contractors and agency staff.

### 3. Definitions

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, child labour and human trafficking.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

Modern slavery and human trafficking are both crimes and violations of a person’s fundamental human rights.

### 4. Procedure:

This procedure is made with reference to Section 54 (1) of the Modern Slavery Act 2015, and is supported by a number of relevant documents.

#### **Business Code of Conduct.**

TRB support and are committed to the United Nations Global Compact and embrace its ten principles which govern aspects of Human Rights, Labour, Environment, and Anti-corruption.

#### **Employee Code of Conduct.**

‘The TRB Way’ makes clear to Team Members, the manner in which they can expect to be treated, and the actions and behaviour expected of them, whilst working at TRB.

We strive to achieve and maintain the highest standards of employee conduct and ethical behaviour and create a culture of trust, employee engagement and continuous improvement.

### **Recruitment Policy.**

We operate a robust recruitment policy, including the undertaking of 'eligibility to work in the UK checks' for all Team Members, in order to safeguard against human trafficking or individuals being forced to work against their will. TRB only use reputable, registered employment agencies to source temporary staff.

### **Whistle Blowing Policy.**

This policy encourages everyone, whether a TRB employee, agency staff, agents, contractors, suppliers or customers of TRB, to report any business misconduct, in the knowledge that, there is no risk to themselves.

This includes any circumstances which may give rise to an enhanced risk of modern slavery or human trafficking.

Our Whistle Blowing Policy is designed to make it easy for Team Members to make disclosures without fear of reprisals.

### **Due Diligence.**

TRB undergo audits by our customers and parent Company which include a check on our commitment to this Anti-slavery and Human Trafficking procedure.

We are also committed to undertaking commercial and operational due diligence when considering new suppliers and contractors.

Before TRB engage the services of a new supplier or contractor, an 'Assessment Questionnaire' is sent out which they must complete and return before any business arrangements are made between the Companies.

One of the criteria checked is that the supplier or contractor commits to upholding our commitment not to deal with any organisation who does not support our stance for anti-slavery, and our stance against human trafficking.

If TRB find that other individuals have breached this policy, or if a potential new supplier or contractor do not support this policy, we will ensure that we take appropriate action. This could mean terminating our relationship.

### **Education & Training.**

TRB educate our staff by providing information on Anti-slavery and Human Trafficking to our Team Members. This is aimed at helping them to;

- Understand the definitions of Anti-slavery and Human Trafficking
- Identify signs of Anti-slavery and Human Trafficking.
- Know how to escalate issues where Modern Slavery is suspected.
- Understand what steps the Company would take if suppliers, or contractors do not implement anti-slavery policies in high risk scenarios, including removing them from our supply chain.

TRB will continue to raise awareness amongst our workforce on an ongoing basis.

**Performance Indicators.**

TRB will monitor the effectiveness of the steps we have taken to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chain.

This will be measured by the level of reports that we have from Team Members, the public or law enforcement agencies that indicate modern slavery and/or human trafficking practices have been identified either within TRB or our supply chain.

A copy of this Anti-slavery and Human Trafficking Statement is available to any person who submits a written request for one. It will be provided within 30 days of such request.

**Exceptions.**

There are no exceptions to this procedure as TRB have a zero tolerance policy to **ALL** instances of Modern Slavery and Human Trafficking.

**5. Forms Used:**