

Anti-Slavery Policy

Introduction

Modern slavery is a crime and may take various forms such as slavery, servitude, forced and compulsory labour and human trafficking. TEP has a zero-tolerance approach to modern slavery and is committed to complying with all relevant laws and regulations pertaining to slavery, human trafficking, and forced labour, including the Modern Slavery Act and other applicable legislation in the regions where we operate.

This policy applies to all who work for TEP in any capacity, including (but not limited to) all employees, temporary workers, volunteers, work placements, sub-consultants, contractors and suppliers.

Responsibility for the Policy

The responsibility for implementing and upholding this Anti-Slavery Policy lies with every employee. The directors are responsible for overseeing its implementation and regularly reviewing its effectiveness. The director nominated to oversee compliance, and any investigations is Katie Shilcock.

Day to day responsibility for the actions of staff, sub-consultants and supply chain is delegated to the Head of People Quality and Development.

Supply Chain Due Diligence

TEP conducts due diligence assessments on our supply chains to identify and mitigate any risks related to slavery and human trafficking. This includes evaluating the practices of our suppliers and subcontractors to ensure they align with our commitment to ethical and responsible business conduct.

Through our Sustainable Supplier Charter, we actively engage with our suppliers and encourage them to adopt anti-slavery practices. We will work collaboratively to address any identified risks and promote the highest ethical standards throughout our supply chain.

Other Policies

There are several policies that ensure our business is conducted in an ethical and transparent manner. These include:

- **Equality and Respect Policy.** Our Equality and Respect Policy covers all aspects of TEP's relationship with staff and to relations between staff at all levels. The policy covers robust recruitment practices to safeguard against any form of modern slavery or human trafficking.
- **Whistleblowing Policy.** TEP employs a Whistleblowing Policy which ensures that all employees understand how they can raise concerns about the treatment of colleagues, or practices within our business, or supply chain without the fear of reprisal.

- Sustainable Supplier Charter. As part of our contract with all chosen suppliers, we require them to adhere to the Charter, which covers Business Ethics, Environment, Climate Change, Employment, Good Practice, Community and Health, Safety and Wellbeing.

Training

TEP is committed to ensuring that all employees are aware of the risks of slavery and human trafficking and understand their role in preventing such practices. All staff are required to review this policy and act in accordance with it at all times. Any concerns or questions should be directed to TEP's People Quality and Development (PQD) team.

Breaches of this Policy

Any breaches of this policy may be treated as Gross Misconduct and may result in dismissal without notice. For individuals, organisations and suppliers working our behalf, we will terminate our relationship if they do not comply with this policy.

Date of Next Review: December 2025



Person with overall responsibility	Katie Shilcock, Director
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Rev	Date	Description of Amendment	Authorised by
00	January 2018	Original Issue	Francis Hesketh
01	January 2019	Scheduled review, no amendments	Joanne Boothroyd
02	October 2021	Updated Head of People, Quality and Development to Associate Director, People Quality and Development. Also updated format to new TEP branding.	Joanne Boothroyd
03	December 2022	Updated title of Associate Director to People Business Partner/HR Manager. Director in charge amended from Francis Hesketh to Katie Shilcock.	Katie Shilcock
04	December 2023	Scheduled review, combined Anti-slavery policy with Anti-slavery statement & updated training requirements	Katie Shilcock
05	December 2024	Scheduled review, update to job titles	Katie Shilcock