

EQUALITY, ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

This policy sets out T.F.Tull's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there are no slavery or human trafficking in its own business and its supply chains. T.F.Tull maintains relationships with many different organisations in its supply chain, as well as directly employing a number of people. In the light of the general law on employment and human rights and more specifically, the *Modern Slavery Act 2015* and the Home Office document '*Human Trafficking (practical guidance)*', the company is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chain is free from slavery and human trafficking.

Organisational Structure and Supply Chains

This policy covers all the activities of T.F.Tull. It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. We expect all who have, or seek to have, a business relationship with T.F.Tull and/or any member of our Company, to familiarise themselves with our anti-slavery policy and to act at all times in a way in which is consistent with our anti-slavery policy.

Responsibility

Managers will liaise with other relevant departments to ensure that risk analysis and investigations/due diligence in relation to modern slavery and human trafficking is carried out as required.

Managers will ensure that employees are given adequate and regular training on the issue of modern slavery so that everyone understands and complies with this policy.

Relevant Policies and Practices

T.F.Tull operates the following policies and practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations. The Company's policy on whistleblowing encourages all its workers, customers and other business partners to report any concerns related to the direct activities of the organisation or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear or retaliation. Employees who have concerns can refer to the Company's Whistleblowing Policy. The nature of the complaint will determine the Company's next course of action.

We endeavour to carry out our own recruitment activities and/or to only use reputable employment agencies to source labour and we carry out appropriate background checks. Personnel responsible for the recruitment activities in any of the subsidiaries are advised to adhere to this policy by ensuring that strict verification of potential employee's right to work is carried out before any offer of employment is made.

T.F.Tull expects its subsidiaries and all supply chain to adhere to recruitment practices that ensure that all terms of employment are voluntary. Where necessary and if required, we may request demonstration of compliance with this policy.

Awareness and Performance Indicators

As well as training employees, the Company will raise awareness of modern slavery issues by emailing the Company's anti-slavery and human trafficking policy to all employees as well as it being made available on the Company's intranet. We expect employees to refer to this policy and understand what is required of them in relation to modern slavery.

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This policy on modern slavery will be communicated to all suppliers, contractors and business partners at appropriate points during our business relationship with them and reinforced as appropriate thereafter.

The Senior Management team have agreed that all members of staff are required to be made aware of Equality and the dangers surrounding potential of Modern Slavery.

To this end each new member of staff will be expected to read and demonstrate that they understand the following policies:

- Recruitment and Selection Policy
- Harassment and Bullying Policy
- Community and Social Responsibility
- Avoidance of Bribery and Corruption Policy
- Equal Opportunities Policy
- Ethical Conduct Policy
- Whistleblowing Policy

T.F.Tull have signed up to Stronger2gether (www.Stronger2gether.org). The senior management team will review the S2G toolkit for UK employers at least every twelve months.

- From April 2018 all Managers and Supervisors will be expected to watch the online e-learning module on the S2G website – Tackling Modern Slavery in the UK.
- All members of staff will be expected to read and understand the Government document – Modern Slavery: A briefing for the Construction Industry.
- All members of staff will be expected to watch *Daniel and Weronika's story*.

Adopting these procedures will help to not only ensure that discrimination does not occur but will also assist in providing evidence of good practice when resisting any claims of discrimination which may be made at an industrial tribunal.

This policy, and its practical application, is regularly reviewed by the Directors.



Peter O'Grady
Managing Director
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