

Modern Slavery & Human Trafficking Policy

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Owner	HR Department	Reviewer	Sue Barnes

1 Scope

The purpose of this policy is to ensure that current Government guidelines on modern slavery and human trafficking are followed and to reinforce that slavery and human trafficking is not knowingly supported within Thomas Graham operations or supply chains. This policy also sets out the expectation that our customers and suppliers uphold the same commitments that Thomas Graham abides by.

As a business we are committed to preventing modern slavery and human trafficking in all our business activities. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity. We have and will continue to implement systems and controls aimed at ensuring that modern slavery and human trafficking is not taking place anywhere in our business or in any of our supply chains.

The term modern slavery is used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human Trafficking is “the action or practice of illegally transporting people from one country or area to another, typically for the purposes of forced labour.”

2 Potential Exposure

In general, Thomas Graham considers its exposure to slavery and human trafficking to be relatively limited. We have taken steps to ensure that such practices do not take place within our business, and we do not knowingly have trading relationships with any customers or suppliers that participate in modern slavery and human trafficking.

3 Commitments

We are committed to following current Government guidelines and legislation concerning modern slavery and human trafficking by:

- Paying our team at our TG minimum wage rate, which exceeds the national minimum wage.
- Treating all members of our teams with dignity and respect.
- Checking and recording of all ‘Right to Work’ documents on employment of our staff members.
- Working with our suppliers to obtain confirmation of their commitment to operating and adhering to the government guidelines and legislation in relation to modern slavery and human trafficking.
- Reviewing Supply Chain Questionnaires for Modern Slavery commitment and processes for suppliers.
- Engaging all employees at all levels with our Modern Slavery and Human Trafficking policy to ensure they understand the associated risks in our business.

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- Providing training on our grievance and whistle-blowing procedures so all employees understand what action they are to take if cases are suspected or found.

3.1 Policies in relation to Modern Slavery

The following policies are in place within Thomas Graham which also support in the prevention of modern slavery and human trafficking:

- **Child Labour Policy:** Outlines our commitment to not knowingly supporting child labour within our operations and supply chain.
- **Whistleblowing Policy:** Provides a mechanism for employees and suppliers to report any concerns about modern slavery or other unethical practices.
- **Grievance Policy:** Provides a structured process for employees and other stakeholders to report concerns or complaints, including those related to modern slavery.

4 Reporting & Protection

If our employees have a concern in relation to the treatment of workers or their working conditions:

- They are to call 999 if they believe the individual is in immediate danger.
- Otherwise, they are to discuss their concerns with the Human Resources Advisor or Manager who will decide a course of action which may include contacting the Police or the Gangmasters Licensing Association (GLA).

Any employee reporting a suspicion of modern slavery or human trafficking will be protected from any detriment even if the suspicion is unfounded.

5 References

Revision	Changes	Date
V3	Modern Slavery & Human Trafficking Policy - Branding and formatting changes - Section 3.1 added	March 2025