



# Anti-Slavery & Human Trafficking Policy

## Document Control

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## 1. Purpose

TNP values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of TNP's staff as well as others acting on our behalf are key to maintaining these standards.

The purpose of this document is to:

- Set out TNP's policy in relation to slavery and human trafficking

## 2. Policy Statement

The Networking People (TNP) Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

## 3. Responsibilities

This policy applies to all TNP employees and to those acting on TNP's behalf. All third parties doing business with TNP or acting on our behalf must follow this policy and put in place procedures to prevent and detect slavery and human trafficking.

All staff will be required to follow the company's written procedures.

The prevention, detection and reporting of slavery or human trafficking is the responsibility of all employees. If you become aware, or suspect that an activity or conduct which is proposed (or has taken place) is related to slavery or human trafficking, then you have a duty to report this.

Managers have responsibility to ensure that each member of their team has access to this policy and has access to any guidance and training required to understand and follow the policy.

TNP Board will nominate a named director to take overall accountability for the policy.

### 3.1. Reporting concerns

You are encouraged to raise concerns about any issue or suspicion of slavery or human trafficking at the earliest possible stage. If you think another TNP employee or third party may be involved in any corrupt behaviour, then report this to your line manager.

### 3.2. Protection

TNP 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. If another employee tries to deter you from reporting your concerns this is a disciplinary offence and will be dealt with as such.

## 4. Reference

<https://www.gov.uk/government/collections/modern-slavery>

## 5. Exceptions

There are no exceptions to this policy

## 6. Review

This policy will be monitored and reviewed regularly. It may be amended from time to time, and as a minimum will be reviewed at least once a year with an annual statement published to indicate the

steps taken to prevent slavery and human trafficking. If employees have concerns about this policy they can be raised with their line manager.

## 7. Commitments

### 7.1. Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and 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 is a crime and a violation of fundamental human rights.

### 7.2. Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our recruitment and contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk based approach we may require:

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code

As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.

If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships