

Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, Senior Directors, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Tuffin Ferraby Taylor (TFT) Limited 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.

Commitments

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.

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:

1. We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
2. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the
3. 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.
4. We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
5. We take a risk based approach to our 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 standards required to combat modern slavery and trafficking.
6. Consistent with our risk based approach we may require
7. employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance
8. Suppliers engaging workers through a third party to obtain that third parties' agreement to be compliant
9. 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.
10. 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.

Modern Slavery Statement

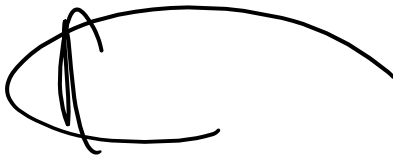
Tuffin Ferraby Taylor (TFT) fully endorses the Modern Slavery Act 2015 and the Senior Directors and Senior Management team is committed, by providing adequate resources and training etc. across the business, to ensuring the firm operates a zero-tolerance approach to forced labour, slavery or human trafficking within our organisation or in any part of our supply chain.

TFT operate a number of internal policies to ensure that business is conducted in an ethical and transparent manner, these policies include:

- Recruitment Policy
- Core Standards of Behaviour Policy
- Ethical Policy
- Training & Development Policy

TFT takes its responsibility towards all employees, including investment in opportunities and knowledge development for undergraduates, graduates, traineeships, apprentices and their equivalents, and in ethical conduct of relationships with business associates and the extended community, and will continue to support environmental, economic and social progress. TFT were early adopters of flexibility to enable the widest participation in development and professional career opportunities.

Further assistance can be found here: Unseen UK Modern Slavery Helpline www.unseenuk.org 08000 121 700.

A handwritten signature in black ink, consisting of a large, sweeping loop that starts on the left, goes up and over, then comes back down and under to the starting point.

1 November 2023