

Anti-Slavery Policy

	Rev 1	
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Approved By (Managing Director):	D. Rossiter	<i>D. Rossiter</i>
Date:	June 2019	
Issue Status:	For Use	

Policy Statement

This Policy sets out the Company's zero-tolerance approach to modern slavery. The Company is committed to acting ethically and with integrity in all its business dealings and relationships and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its UK or Global business operations.

Modern slavery is a crime and a violation of fundamental human rights. The Company recognises this takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Company is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from all of its suppliers, contractors and other third parties. As part the Company's contracting processes, it expects that its subcontractors will hold their own subcontractors/suppliers to the same standards set out in this policy.

The Company's directors have overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations, and that all those Staff and Third Parties under its control comply with it.

This policy does not form part of any employee's contract of employment and the Company may amend it from time to time, albeit with updated versions formally issued accordingly.

Who does this Policy Apply to?

This policy applies to all persons working for Transcar Projects Limited (the "**Company**") or on its behalf in any capacity, including employees at all levels, directors and officers ("**Staff**") , and third parties including agency workers, clients, agents, subcontractors, suppliers, seconded workers, volunteers, interns, external consultants ("**Third Parties**").

Scope and Purpose of the Policy

This policy describes how the Company will prevent, detect (through effective controls and notification techniques) and report modern slavery in any part of its business or supply chains.

The Company aims 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. The Company is committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the business. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. See also Section 19 - Anti-Harassment & Anti-Bullying Policy within IMS-3.5 – Company Staff Policy Manual.

If any staff believe they have suffered any such treatment, the individual should inform either their manager or the HR representative immediately. If the matter is not remedied, an employee should raise it formally in accordance with the Grievance Procedure, as detailed in Section 16 of IMS-3.5 - Company Staff Policy Manual.

Compliance with the Policy

All Staff and Third Parties must comply with this policy and are required to avoid any activity that might lead to, or suggest, a breach of this policy.

All Staff and Third Parties are required to raise any concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage.

If any Staff believe or suspect a breach of this policy has occurred or that it may occur the individual must notify either their manager or senior management. Third Parties should notify a senior Company point of contact, i.e. Managing Director, General Manager or Line Manager.

If Staff or Third Parties are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, this should be raised as set out in this Policy.

Whilst this Policy is also referenced from within the Company Staff Policy Manual, all managers are responsible for ensuring that this Policy and the Company's zero-tolerance approach to modern slavery is communicated to all employees and for ensuring that those individuals reporting to them understand and comply with this Policy and are given adequate and regular training as applicable on the Policy and the issue of modern slavery in supply chains.

Management have day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Compliance with the Policy (cont.)

All managers who are responsible for procurement of goods and / or services must ensure that this Policy and the Company's zero-tolerance approach to modern slavery is communicated to all Third Parties during the procurement process and / or at the outset of each business relationship.

Managers are responsible for ensuring that:-

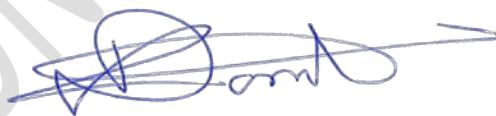
- all relevant existing Third Party contracts include obligations to comply with the Modern Slavery Act 2015;
- new Third Party contracts contain applicable prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

Managers may utilise the Template Letter in Schedule 1 (IMF56 – Anti-Slavery Letter of Compliance) for amending existing contracts and Template Contract Clauses in Schedule 2 for inclusion in all new contracts entered into following the launch of this Policy.

Investigations & Disciplinary Action

Any employee who breaches this policy will be subject to disciplinary action, which may result in dismissal for misconduct or gross misconduct.

The Company consistently reserves the right to terminate its relationship with other third parties if they are discovered to be in breach this policy.



Dean Rossiter
Managing Director

Schedule 1

TEMPLATE LETTER for use with Subcontractors where the contract does not contain a requirement to comply with the Modern Slavery Act 2015.

TRANSCAR PROJECTS LIMITED
Integrated Management System
Anti-Slavery Letter of Compliance



Dear Subcontractor,

Subject: Modern Slavery Act 2015

It is our duty to request that unless you are already aware, you familiarise yourself with the Modern Slavery Act 2015, under which companies who meet the threshold are required to implement and enforce effective systems and controls to ensure modern slavery is not taking place in any of its supply chains.

Transcar Projects has a zero-tolerance approach to modern slavery, which is a crime and a violation of fundamental human rights. We recognise this takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships with suppliers.

If you supply goods or services to us, you must agree to do so as set out below:

- In compliance with the Modern Slavery Act 2015; and the Transcar Projects Limited Anti-Slavery Policy (as amended from time to time), which is available upon request;
- You also undertake, warrant and represent that you shall implement appropriate due diligence procedures for your own suppliers, sub-contractors and other participants in its supply chains to ensure that there is no slavery or human trafficking in their respective supply chains; and
- You agree to notify us and confirm the same promptly in writing immediately upon discovering any breach or potential breach of the Modern Slavery Act or any actual or suspected slavery or human trafficking in your supply chains.

Please confirm your agreement to the above, in addition to any other terms and conditions agreed between the parties, by signing and returning a copy of this letter.

Yours faithfully
TRANSCAR PROJECTS LIMITED

I agree to the above terms relating to the Modern Slavery Act 2015, in the event we supply goods and/or services.

Company:

Print Name:

Position:

Signature:.....

Date:

Issue Date: 18th June 2019
Form No: IMFS6 Rev: 1

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Schedule 2

TEMPLATE CONTRACT CLAUSES which can be included in all Goods and/or Services Contracts:-

NOTE: The clauses can be renumbered and the terminology changed to reflect the language used in the applicable contract.

Compliance with Anti-Slavery and Human Trafficking Laws

In performing its obligations under the agreement, *[name of the Subcontractor/Supplier]* shall:

- Comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015; and have and maintain throughout the term of this agreement its own policies and procedures to ensure its compliance;
- Not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4, of the Modern Slavery Act 2015 if such activity, practice or conduct were carried out in the UK or International workplace; and
- Include in its contracts with its direct subcontractors and suppliers, anti-slavery and human trafficking provisions that are at least equivalent to those set out in this clause.

[Name of the Subcontractor/Supplier] warrants and represents that neither *[name of the Subcontractor/Supplier]* nor any of its officers, employees or other persons associated with it has been convicted of any offence involving slavery and human trafficking; and having made reasonable enquiries, to the best of its knowledge, has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.

[Name of the Subcontractor/Supplier] shall notify Transcar Projects Limited as soon as it becomes aware of:

- Any breach, or potential breach, of this clause; or
- Any actual or suspected slavery or human trafficking in a supply chain which has a connection with this contract.