



# Anti-Slavery, Human Trafficking, and Servitude Policy

## 1. Policy Statement

1.1 Modern slavery, in its many forms, is a crime and a gross violation of fundamental human rights as it denies a person of their liberty to exploit them for personal or commercial gain. For slavery to exist, only one of the following needs to be present:

- Dehumanisation
- Physical Constraint on Freedom of Movement
- Forced Labour
- Ownership or Control by an Employer

1.2 TDR Groundworks Ltd has a zero-tolerance approach to modern slavery, and is committed to ensuring that modern slavery, in any of its forms, does not have any place within our company or our company's supply chains.

1.3 Our Anti-Slavery, Human Trafficking, and Servitude Policy applies to all individuals and organisations working for or on behalf of TDR Groundworks Ltd.

## 2. Responsibility for this Policy

2.1 The Directors of TDR Groundworks Ltd have overall responsibility for ensuring:

- Complete compliance with this policy by all individuals and organisations in our supply chains and business
- The policy's compliance with our legal and moral duties
- That any breaches or concerns are addressed in line with the Public Interest Disclosure Act 1998

2.2 All persons working for and with TDR Groundworks Ltd are responsible for:

- Upholding our zero-tolerance approach to slavery, human trafficking, and servitude
- Preventing, detecting, and reporting any breaches or concerns immediately

### **3. Compliance with this Policy**

3.1 All persons working for TDR Groundworks Ltd must ensure that they read, understand, and conform to this policy.

3.2 All persons working for or with TDR Groundworks Ltd are encouraged to express any concerns of non-compliance within our supply chains or business as soon as possible. All reports and concerns will be dealt with confidentially, and any whistle-blowers protected in line with the Public Interest Disclosure Act 1998.

### **4. Communication and Awareness of this Policy**

4.1 TDR Groundworks Ltd will communicate this policy to all its employees.

4.2 All persons working for TDR Groundworks Ltd are expected to communicate our zero-tolerance approach to slavery, human trafficking, and servitude to all individuals and organisations working with or on behalf of TDR Groundworks Ltd from the outset of our business relationship and thereafter.

### **5. Breaches of this Policy**

5.1 Policy breaches will generally be treated by TDR Groundworks Ltd as gross misconduct and may result in dismissal without notice.

5.2 Any business relationship TDR Groundworks Ltd shares with individuals or organisations found in breach of this policy may be terminated.