

TENNALS GROUP LTD

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Signed:  _____ Date: 14/10/2019 _____

Position: DIRECTOR

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MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Section 54 of the Modern Slavery Act 2015 requires commercial organisations to prepare a slavery and human trafficking statement for each financial year of the organisation. The statement must set out the steps that the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business. If the

Introduction

This statement sets out Tennals Group Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 October 2018 to 30th September 2019 and the current year to date.

As part of the industry sector the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of trading divisions and subsidiary companies of Tennals Group Limited. (the organisation)

- The Company offers services in the form of supply, installation and servicing of Fire Detection and Alarm, Intruder Alarms, CCTV Systems, Access Control Systems, Emergency Lighting Systems, Portable Fire Extinguishers, Alarm Monitoring and Pest Control

Countries of operation and supply

The organisation currently operates in the following areas

- Throughout Great Britain and Northern Ireland, Republic of Ireland

Definitions

The organisation considers that modern slavery encompasses:

- Human Trafficking
- Forced work through physical or mental threat
- Being owned or controlled by an employer through physical or mental abuse
- Being dehumanised or being bought or sold as property
- Being physically constrained or to have restriction imposed on freedom of movement.

The organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions of the Modern Slavery Act 2015. The organisation understands that this will necessitate in an ongoing review of its internal practices and supply chains.

Tennals Group Limited does not and will not enter into business with any other organisation either at home or abroad which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

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High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

The organisation considers its exposure to slavery/human trafficking to be extremely limited. However, it has taken steps to ensure that such practices do not take place in its business(s) or the business of any organisation that supplies goods or services to it

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows

- Policies
- Risk assessments
- Investigations/due diligence
- Training

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

Whistleblowing policy The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** In addition to recruiting directly by the organisation, the organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Equal Opportunities Policy** The Organisation recognises the need for an equal opportunities policy and for that policy to be implemented effectively

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Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain;
- conducting supplier audits or assessments through the organisation's own staff/ auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- using an ethical supplier database, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship
- The board of directors has overall responsibility for ensuring that this policy complies with legal and ethical obligations and that all persons under their control comply with it.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. Thus, the organisation:

- Will ensure that no reports are received from employees, the public or law enforcement agencies to indicate that modern slavery practices have been identified

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating emails and notices to staff.

The emails explain to staff

- the basic principles of the Modern Slavery Act 2015;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation

Compliance with this policy

- All employees of the organisation must ensure that you read, understand and comply with this policy
- The prevention detection and reporting of modern slavery in any part of the organisations business or supply chain is the responsibility of all those working for the organisation or under its control.
- All employees of the organisation are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the business or supply chains of any supplier tier at the earliest opportunity.

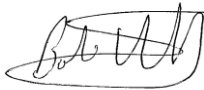
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- The organisation aims to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. The organisation will ensure that no-one suffers any detrimental treatment as a result of reporting in good faith.

Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually.

Director's signature:

A handwritten signature in black ink, appearing to read 'R J Duddin', enclosed within a simple rectangular border.

R J Duddin

Date: 14th October 2019