



## **Modern slavery statement for financial year 2015/16**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that TCL Group (including TC Landscapes, Burleys, Clean Estates, Playforce, Ice Watch and Plantscape) has taken, and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. TCL Group has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our business**

TCL Group is one of the fastest growing landscape services, estate management and play space services providers in the UK, operating on a National Scale across the UK (excluding Ireland and Northern Ireland). TCL Group has an annual turnover of £45 million. Our supply chains are extensive and global.

### **Our high-risk areas**

In terms of understanding our greatest risk, there are well known reported instances in the Construction Industry where there is potential for workers to be put at risk of forced labour. The employment of Eastern European workers within this Sector also presents a high risk to our Business.

We conduct Risk Assessments and pre-employment checks, including Right to Work and background checks on our employees.

### **Our policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

### Our suppliers

TCL Group operates a supplier policy and maintains a preferred supplier list of both subcontractors and suppliers. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. We may terminate the contract at any time should any instances of modern slavery come to light

### Training

We understand the risk of modern slavery is not static, and we must continue to focus on this in the years ahead, with a particular focus on staff development and awareness on spotting the warning signs of modern slavery.

### Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

We have laid the groundwork for preventing Modern Slavery within our Business and supply chain through the Policies and Procedures we have implemented, but we know need to ensure that these are being followed and practiced.

This will be a key area of focus in the coming 12 months.

### Approval for this statement

This statement was approved by the Board of Directors on 8<sup>th</sup> January 2018.

Name: *S. CASHMORE*

Position: *CEO*

Signature: 

Date: *8/1/18*