

## **ANTI-SLAVERY, HUMAN TRAFFICKING, AND ILLEGAL WORKING POLICY STATEMENT**

We are a nationwide building services contractor delivering the full range of mechanical, electrical and ICT services. Our strong teams across the country cover the whole lifecycle of the project from concept, design, construction through to lifetime maintenance. As a leader in our chosen markets, our objective is to deliver excellent services for our customers, resulting in safe, fair and professional contracting services at all times.

We recognise that the execution of our services involves labour being procured throughout our business and supply chains and understand that this entails the risk that modern slavery may take place. We acknowledge that modern slavery is a crime and a violation of fundamental human rights. It 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 have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business undertakings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in either our own business, or in any of the businesses of our supply chains.

Everyone in our supply chain has been sent this policy as part of our trading requirements during the last year.

Where any of our suppliers exceed a global turnover of £36m, we reserve the right to undertake an on-site audit of their compliance. We also refer to the Government publication: Transparency in Supply Chains etc. A Practical Guide.

### **Illegal Working**

We ensure compliance with sections 15 to 20 of The Immigration, Asylum & Nationality Act 2006. Risk assessments are produced to ensure compliance with this section and current Home Office guidance; and audited by the Quality Assurance Team once per annum as a minimum.

This area is reviewed during every management review meeting. Working status screening is undertaken on every person working for the Company. No one can start work until a successful screening has taken place.

The risk assessments and actions required are made available to all staff and addressed during staff awareness training sessions.

Our HR department is responsible for ensuring compliance to Home Office guidance (for Employers on Preventing Illegal Working). Employee records, including agency workers are retained by the Company for a minimum of 2 years after ceasing to work for the Company.

This policy will be reviewed on an annual basis or if there is a change to legislation.

Our approach to ensuring that slavery and human trafficking do not take place within our organisation is one of risk management driven by our core values:

### **Integrity**

We are committed to ensuring that there is transparency in our business and in our approach to tackling modern slavery that is consistent with our disclosure obligations under the Modern Slavery Act 2015.

### **Intelligence**

We will take an intelligent approach to ensuring that our business and supply chains have effective systems and controls in place to ensure that slavery does not take place.

### **Teamwork**

Our employees and supply chain will work together in alignment with our internal processes to ensure compliance with the Modern Slavery Act 2015.

# TClarke

## **Performance**

We are committed to implementing systems and processes to ensure that there is zero-tolerance towards any acts of modern slavery within our business and throughout our supply chains.

## **Respect for People and Communities**

We believe that modern slavery violates fundamental human rights and we are committed to play our part in ensuring that this does not take place within our community.

In adhering to this policy, in particular we will: -

- Include, as part of our contracting processes within our supply chain, obligations to ensure compliance with the requirements of the Modern Slavery Act 2015.
- Encourage openness and provide support to anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are 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 our own business or in the businesses of any of our supply chains.
- Communicate our zero-tolerance approach to modern slavery with our supply chain and business partners at the outset of our business relationship with them.

Our employees are collectively and personally responsible for the communication, understanding and practical application of this policy. This policy will be made available to all new employees at recruitment stage and to our supply chain and to any other interested parties upon request. Revisions will be communicated to those affected by the changes.

## **Training & Awareness**

This policy and risk assessments produced are used as the framework for staff training & awareness sessions across the Group.

Our employees have a personal responsibility to report any actual or suspected instances of modern slavery throughout the business or supply chain to TClarke's HR Department or Legal Advisor. Breaches of this policy will be dealt with under TClarke's disciplinary procedures and could lead to dismissal in applicable circumstances.

The Board and Senior Management are committed to implementing and enforcing effective systems which prevent, monitor and eliminate Slavery and Human Trafficking.

The Company appreciates that the risk of Slavery and Human Trafficking may change over the course of time and therefore Mark Lawrence; CEO will take responsibility for reviewing this policy and its implementation on a regular basis.



**Mark Lawrence** (Group Chief Executive Officer)

Date: January 2026