

ANTI-SLAVERY POLICY

TCG

TCG is committed to conducting all aspects of its business in an ethical and transparent manner. We acknowledge our duties and responsibilities under the UK's Modern Slavery Act 2015.

Forced or compulsory labour, human trafficking and other kinds of slavery represent some of the gravest forms of human rights abuse in any society. We all have a responsibility to be alert to the risks in both the TCG business and our supply chain.

TCG values require that all workers are treated with dignity and respect. We are fundamentally opposed to slavery, human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace.

TCG requires that all contractors and suppliers do not engage in any such practices, and do not knowingly themselves contract with third parties which do.

We have a zero-tolerance policy towards all forms of slavery, servitude, forced labour and human trafficking. We recognise that the biggest slavery and human trafficking risks for TCG lie in our supply chains, particularly the supply chains of our subcontractors in higher-risk jurisdictions.

As part of our subcontractor due diligence procedures, we continue to develop our vetting process. In the countries where TCG operates, potential new subcontractors are required to sign up to our "Anti-slavery and human trafficking supply chain commitment" (the Supply Chain Commitment) as part of the subcontractor approval process. It is our intention that TCG-approved contractors will progressively be required to sign up to our Supply Chain Commitment.

In terms of our supply chain, we are in the process of taking additional steps to strengthen our approach to due diligence and ability to identify risk. Additional resource is being allocated to our business assurance team, with a view to undertaking regular right-to-work compliance audits within our supply chain. This will help us to assess the understanding and knowledge that our supply chain partners have, and will also provide the opportunity to educate, where necessary. On a random basis, we also plan to develop on-site spot checks to check right-to-work documentation; this will also include speaking with subcontractor employees who are working on TCG-managed sites, to ask questions about their welfare and give opportunities to find 'red flag' modern slavery risks that may be present.

We have also confirmed improvement actions that have taken place within the Group during the past 12 months, or are planned during the next year, to reduce the risk of slavery or human trafficking taking place within ISG or our wider supply chain.



Kelvin Hon
Managing Director
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