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## MODERN SLAVERY POLICY

### INTRODUCTION

True Plant Hire Ltd T/A True Group (The Company) Policy and factsheet has been prepared to provide guidance to all employees and other persons who may act for The Company such as agents, consultants and temporary workers and companies within The Company's supply chain on the practical arrangements introduced by The Company to ensure compliance with the Modern Slavery Act 2015 that was made effective from 29th October 2015.

The factsheet aims to raise awareness among all employees and other persons working on behalf of or with The Company of the risk of modern slavery at work and to provide information on what steps the organisation has put in place to reduce the risk of slavery occurring either in the workplace or the supply chain. It also aims to communicate The Company's policy on anti-slavery and give practical advice on what should be done where an employee (or other relevant person) is either exposed to slavery, or suspect's slavery is occurring in the workplace or in the supply chain.

### POLICY


The Company is committed to the prevention of forced labour, human trafficking and related forms of modern slavery. The Company strictly forbids any employee, consultant, agency worker, agent or any other person connected with its business from participating in slavery and only works with companies who operate ethically and comply with social and human rights criteria. The Company positively encourages employees, agency workers, agents, consultants and any other person working on behalf of or with The Company to immediately report any instance where they are either exposed to slavery, or suspect slavery is occurring in the workplace or in the supply chain.

The Company Code of Conduct and specific guidance on due diligence processes which apply to employees, suppliers, sub-contractors and other business partners is given below.

The Company is committed to legal compliance, ethical standards and fundamental human rights as described in the ILO's international law on forced labour such as the Abolition of Forced Labour Convention (C105) and Worst Forms of Child Labour Convention (C182) and is committed to supporting any person representing The Company, to avoid slavery.

The Company person with specific responsibility for anti-slavery responsibilities and procedures is the Managing Director. The Company is committed to putting in place appropriate measures where there is a risk of slavery in the workplace or the supply chain and to the monitoring/reviewing of the effectiveness of such measures on a regular basis.

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Any employee found to be committing an offence under the Modern Slavery Act 2015 will be subject to disciplinary proceedings. The Company has defined the infringement of human rights as “Gross Misconduct”, which if found against an employee would result in dismissal for a first offence. In addition, an employee is likely to also face criminal proceedings/charges.

Non-employed individuals or organisations found to engage in forced labour, trafficking or slavery will be removed from the list of approved suppliers immediately and may also face criminal proceedings/charges.

The Company will not hesitate to make the appropriate external authorities aware of any suspected human rights abuse which may arise from one or more of the following five offences under the Modern Slavery Act.

### **What the Modern Slavery Act covers – the five offences**

Under the Modern Slavery Act there are five specific definitions of offences which are in contravention of basic human rights and which a company and/or individual can be prosecuted, in most countries around the world.

#### **Modern Slavery**

The deprivation of one person by another of their liberty in order to exploit them for personal or commercial gain.

#### **Forced Labour**

A person who enters work or service against their freedom of choice and cannot leave without penalty or the threat of penalty e.g. physical punishment or constraint, loss of rights or privileges, retention of identity paper or threats of denunciation to immigration authorities.

#### **Trafficking in Persons**

The act of recruitment, transportation, transfer, harbouring or receipt of a person by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

#### **Bonded Labour**

Also known as debt-induced forced labour and debt bondage. This involves the taking of a loan or an advance of wages by a worker from an employer or labour recruiter in return for which the worker pledges his or her labour and sometimes that of family members to pay back the loan. Debts may be passed onto the next generation.

#### **Failure to prevent slavery**

A “corporate” offence which occurs when an organisation fails to stop people who are operating on its behalf from being involved in slavery.

## WHO THE MODERN SLAVERY ACT COVERS

Under the “corporate” offence, an organisation can be prosecuted if it is unable to show it had “adequate procedures” in place to minimise the risk of slavery occurring. Liability under the “corporate offence” can therefore be triggered where not only an employee is involved in an act of slavery, but also any other “person associated with the organisation”. This will for example, include, consultants, agents, agency workers and subsidiaries. The implication is that it widens significantly the scope for an employer to be prosecuted for the actions of its employees and business partners, unless of course it can show it has adequate procedures/measures in place to prevent slavery. The UN Guiding Principles on Business and Human Rights (UNGP) provide a clear framework that is endorsed by the UN Human Rights Council and are widely accepted by the business community, trade unions, civil society and governments around the world.

The Guiding Principles are founded on three pillars:

### **Protect**

States have a duty to protect, promote and support human rights.

### **Respect**

Companies have a responsibility to respect human rights and “do no harm”.

### **Remedy**

Both must ensure that victims of business-related abuses have access to effective remedy.

Six Steps for implementing the UN Guiding Principles:

The Company are drawing on the UN Guiding Principles approach and taking six steps to tackle forced labour, human trafficking and modern slavery in The Company’s workplace or in our supply chains:

### **Commit**

- Make a public commitment to respect Human Rights.
- Identify a Board Director (or equivalent) with overall responsibility for addressing human rights risks within the business and supply chain. The person with responsibility in this organisation is the Managing Director.
- Form a strategic level working group comprised of the appointed Human Rights Director and senior functional managers.
- Decide the scope of the business’s human rights impact and define the business’s vision for tackling modern slavery.

### **Assess**

- Understand modern slavery risks in supply chain by assessing and identifying where the greatest risks of slavery occur in the supply chain.
- Whilst slavery and human trafficking may occur in practically all industries and levels of supply chains the most serious human rights impacts are more likely to occur where activities are sub-contracted out to suppliers and agents at very low cost and where the law is weak or not properly enforced. Developed economies have found forced labour in a wide range of sectors where vulnerable and migrant workers are employed.
- Mapping the business supply chain will identify where the risks of slavery and human trafficking are greatest and also where there is a lack of information about the business’s direct and indirect suppliers.

## **Act**

- Develop an action plan to either reduce the risks of slavery occurring or to tackle cases of slavery where they are identified.
- A business which has assessed their supply chain understands their risks and has assessed those risks in detail before taking corrective actions to address any issues identified as well as to prevent future issues occurring.
- The actions the business takes should focus on working with high and medium risk suppliers whilst continuing to engage low risk suppliers.
- The business should explore targeted collaborations with government, trade unions, industry bodies and/or civil society groups when addressing systemic issues in order to minimise any gaps and reduce the likelihood of future risks.

## **Remedy**

Provide a solution for victims of slavery and human trafficking through remedial measures which include:

- Restitution through judicial or other methods to restore the victim to the original situation before the abuses occurred.
- Compensation by providing financial or non-financial compensation that is appropriate and proportionate to the gravity of the violation, including physical and mental harm, consideration of lost opportunities e.g. Employment (loss of earnings) and benefits, if relevant.
- Rehabilitation including offering victims medical, physiological and psychological care, where relevant, access to legal and social services and retraining and reintegration into the labour market and community.
- Satisfaction and guarantee of non-repetition by issuing a public apology from the business or its supplier may be required to acknowledge the violation and accept responsibility. Businesses should also identify the steps required to prevent future violations, possibly with analysis of root causes.

## **Monitor**

- Monitor progress towards agreed improvement measures regularly to reinforce the business commitment to improving standards in the supply chain.
- Consider tracking efforts, using tools and indicators that are already used to manage suppliers, including complaints and feedback systems.

## **Communicate**

Communicate openly to stakeholders about progress made and the challenges faced.

Identify what information to share and how to share it with internal and external stakeholders.

General principles to apply include:

- keeping information as up to date as possible;
- communicating via appropriate channels;
- focus on actual activities and their impact;
- being open about challenges and efforts to address the challenges;
- using real voices to provide authenticity; and
- not compromising or posing a risk to affected stakeholders e.g. workers, suppliers and local communities.

Where The Company, following a risk assessment process has identified “no risk”, no additional action is required although the employee handbook will provide relevant information on slavery in the workplace to increase awareness among staff.

Where The Company has identified a “low” risk, the following action(s) will be put in place, in addition to any specific actions identified through the risk assessment questionnaire.

All relevant employees, agents, consultants, etc, must be issued with a copy of this policy, including new joiners and asked to confirm that they have read it and agree to comply with its content.

Where The Company has identified a “medium” risk, the following additional action(s) will be put in place, in addition to any specific actions identified through the risk assessment questionnaire.

All relevant employees, agents, consultants etc will be asked to complete a “self-declaration” questionnaire.

Where The Company has identified a “high” risk, in addition to the measures stated previously, special actions will need to be implemented. Further guidance should be sought from the person identified with overall responsibility for anti-slavery measures.

In line with good business practice, the following measures should be adopted by The Company, irrespective of risk level.

#### **DUE DILIGENCE - PRE-EMPLOYMENT CHECKING (all new employees)**

The HR function will continue to undertake employment checks, including references, proof of identity and any other pre-employment checks considered necessary for new employees.

#### **DUE DILIGENCE – ALL NEW BUSINESS PARTNERS (non-employees)**

Managers responsible for hiring agents, consultants and other business partners should ensure that appropriate checks are undertaken in line with good business practice.

Specific advice should be sought from the person nominated with responsibility for anti-corruption where business partners are engaged in a market identified as high risk.

### **REVIEW OF ANTI-CORRUPTION MEASURES**

The Company will undertake a periodic review of its anti-slavery measures. Where an organisation commences business in a new market, the manager should ensure that a risk assessment is undertaken to establish whether any additional measures should be taken, before commencing business in the new market.

### **FURTHER INFORMATION**

Further information can be obtained from the following sources.

A copy of the Government’s guidance on the Transparency in Supply Chains can be downloaded from: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/471996/Transparency\\_in\\_Supply\\_Chains\\_etc\\_A\\_practical\\_guide\\_final\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc_A_practical_guide_final_.pdf).

#### **Modern Slavery Helpline**

The UK Government also provides a 24-hour modern slavery helpline that victims, employers and members of the public who may encounter modern slavery can call for expert support and advice: Telephone: 0800 0121 700

**Signed by:**

A handwritten signature in black ink on a light yellow rectangular background. The signature consists of a stylized 'T' followed by the name 'Macfarlane' and a small flourish at the end.

**Tom Macfarlane**  
**Managing Director**

**Date:** 21.08.25

**Review Date:** 21.08.26