

	UK Modern Slavery Policy Statement			No.:	ESG-GB-POL-005
				Version:	002
				Date:	27/05/2026
Document Type: Policy	Company: TSL	Document Owner: Head of Social Compliance	Document Approver: Group Director Compliance	Document Classification Public	

1.0 Introduction

1.1 This statement is made in accordance with Section 54, Part 6 of the Modern Slavery Act 2015 (the “Act”) and sets out the steps taken by TSL Ltd herein referred to as ‘TSL’ to prevent modern slavery and human trafficking within our operations and supply chain.

TSL is committed to conducting business ethically and with integrity in all our relationships. We maintain a zero-tolerance approach to modern slavery and are committed to ensuring that all forms of slavery, servitude, forced or compulsory labour, and human trafficking do not take place within our business or supply chain.

We recognise that the construction sector presents heightened risks in relation to labour exploitation due to a range of inherent risk factors, including project-based delivery models, reliance on subcontracting and labour providers, complex multi-tiered supply chains, and potential worker vulnerabilities such as language barriers or insecure employment conditions.

In response, TSL adopts a risk-based and continuously evolving approach to addressing modern slavery. We are committed to strengthening our processes, improving transparency, and deepening our understanding of risk across our operations and supply chain. Our approach is guided by the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organisation (ILO) which underpin our commitment to respecting human rights.

2.0 Our Organisation

2.1 With a head office in Gerrards Cross, Buckinghamshire, United Kingdom, TSL Ltd is part of Tonroe Group who have projects globally a design and build contractor delivering turnkey construction projects across a global portfolio spanning the EU, the Americas, and APAC.

The Group operates across the food, pharmaceutical, logistics, residential, data centre, and high-tech manufacturing sectors, with activities including civil engineering, earthworks, remediation, industrial and commercial construction, residential development, fit-out, and the installation of specialist equipment.

TSL Ltd. employs approximately 450 staff and engages a network of subcontractors to support project delivery, reflecting the labour model typical of the construction sector.

2.2 Responsibility for modern slavery prevention and wider labour and social compliance matters sits within TSL’s Group Compliance and Sustainability function, supported by regional and in-country compliance personnel responsible for implementing local processes, controls, monitoring, and escalation procedures across all operating jurisdictions.

TSL maintains dedicated compliance resources within its UK operations to support the management of labour standards, worker welfare, subcontractor compliance, audits, and ongoing monitoring activities across projects and the supply chain. These functions work in collaboration with operational, procurement, HR, and project delivery teams to support effective implementation of this Policy and applicable legal requirements.

2.3 TSL supports several charities that provide safehouses and support in the community for survivors of trafficking and modern slavery. TSL particularly focuses on working with individuals, communities, businesses, and governments to drive permanent change.

3.0 Supply Chain

3.1 TSL operates within and is regularly responsible for the management of a complex and multi-tiered supply chain environment, typical of the construction sector in the UK. We recognise that collaboration with the supply chain is critical to identifying, preventing, and mitigating human rights risks.

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At TSL, there is a strong emphasis placed on building long-term, trusted relationships with our supply chain, underpinned by shared values and ethical conduct. We are committed to working with organisations that share our values and uphold standards consistent with our zero-tolerance approach to modern slavery.

The TSL social compliance team maintain ongoing engagement with suppliers through meetings in their head offices, site interactions, and regular communication. This supports awareness of our expectations, reinforces accountability, and promotes alignment with our standards on ethical labour practices.

TSL recognises that labour, ethical, and modern slavery risks can arise at multiple levels of the construction supply chain, including through the sourcing of labour, materials, manufactured goods, and subcontracted services. These risks may differ depending on the nature of the engagement, geographic location, workforce model, and tier within the supply chain.

For the purposes of this Policy, “Subcontractors” are organisations or individuals engaged to perform construction-related works or services on behalf of TSL, including the provision of labour. “Suppliers” are organisations that provide goods, materials, equipment, plant, or ancillary services to TSL, whether directly or indirectly connected to project delivery.

All Suppliers and Subcontractors are required to operate in compliance with applicable labour laws, employment standards, anti-slavery legislation, and relevant international labour principles. As part of their contractual obligations, Suppliers and Subcontractors must confirm compliance with the TSL Subcontractor Labour Compliance Policy, applicable purchase order and subcontract terms, and all relevant legal and regulatory requirements within the jurisdictions in which they operate.

TSL expects Suppliers and Subcontractors to maintain appropriate policies, controls, and due diligence procedures proportionate to the nature and risk profile of their operations and supply chains. TSL reserves the right to request supporting evidence, undertake audits or assessments, and take appropriate action where concerns relating to labour standards, worker welfare, or modern slavery risks are identified.

4.0 Supporting Policies

4.1 Our approach to modern slavery prevention is underpinned by a suite of policies designed to mitigate the risk of exploitation across our operations and supply chain. These policies have been developed with the specific risks inherent to the construction sector in mind, reflecting the labour-intensive and multi-tiered nature of our industry.

These include:

- Our **‘Supplier Code of Conduct’**, which explicitly prohibits all forms of modern slavery, including forced and child labour, and establishes the standards expected of our suppliers. Adherence with this Code is embedded within our contractual arrangements, and audits are carried out to ensure compliance.
- This is supported by our **‘UK Subcontractor Labour Compliance Policy’**, which outlines our approach to labour standards and right to work requirements;
- and our **‘Speak Out (Whistleblowing) Policy’**, which enables employees and third parties to raise concerns confidentially and without fear of retaliation.

Together, these policies provide a structured framework for setting expectations and managing risk. We continue to review and enhance this framework to ensure it remains effective and proportionate to the risks we face.

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Oversight is embedded within our governance structure, with senior management accountability and Board-level visibility. Policies are accessible to employees via our intranet, and key requirements are communicated to our supply chain to support awareness and compliance.

5.0 Risk Assessment & Due Diligence

5.1 There is no single solution to modern slavery. We therefore take a multi-faceted approach that reflects the realities of the construction sector:

Approach	Action
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Desk Based Risk Assessment	<p>TSL undertakes structured, risk-based due diligence at onboarding and throughout the supplier lifecycle.</p> <ul style="list-style-type: none"> Map supply chains to identify sector and geographical risk exposure Conduct supplier onboarding checks through Pre-Qualification Questionnaire (PQQ) processes, including modern slavery criteria Assess supplier policies, controls, and labour standards declarations through bespoke audits Develop and maintain supplier risk profiles, reviewed periodically Undertake periodic desk-based reviews and audits Carry out document checks and spot checks (e.g. right to work, contracts)
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Site-Based Controls	<p>These processes are supported by site-level controls, including;</p> <ul style="list-style-type: none"> Deliver site-level training, briefings, and awareness sessions on modern slavery and unethical labour risks Training site teams to remain alert to indicators of exploitation Conduct announced site audits Undertake unannounced inspections or monitoring visits Provide clear escalation routes for reporting concerns
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Supplier Management & Remediation	<p>Where risks are identified, TSL applies a proportionate and escalating response. Initial action focuses on capability building through knowledge sharing and training. Where required, formal improvement plans are agreed, implemented, and monitored by the Group Compliance Manager. TSL may also apply sanctions, including termination of the business relationship and external reporting, with decisions overseen by the TSL Board.</p>
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Continuous Improvement	<p>TSL maintains oversight through defined governance structures, clear reporting channels, and ongoing monitoring activities. Lessons learned are captured and shared across the business to strengthen controls, with a continued focus on enhancing the effectiveness of its approach to managing modern slavery risks.</p>
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6.0 Training & Awareness

6.1 TSL recognises that training plays a critical role in the prevention, identification, and remediation of modern slavery risks. We are committed to building awareness and understanding of modern slavery across our operations, ensuring that our workforce is equipped to recognise potential indicators and respond appropriately.

All employees are required to complete modern slavery training as part of onboarding, with additional role-specific training provided where appropriate. At site level, this is reinforced through toolbox talks, briefings, and ongoing awareness sessions focused on teaching ethical labour standards and recognising potential indicators of modern slavery.

The organisation's advanced modern slavery training course includes.

- How to assess the risk of slavery and human trafficking concerning various aspects of the business, including available resources and support.
- How to identify the signs of slavery and human trafficking.
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation and;
- What messages, business incentives, or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies.

6.2 Through this approach, we aim to embed a culture of vigilance and accountability across our operations, supporting early identification of risks and enabling timely escalation and intervention where concerns arise.

7.0 Stakeholder Engagement

7.1 Collaboration is central to strengthening our approach to modern slavery. We engage with industry bodies and initiatives to support best practice and continuous improvement.

This includes participation in the Supply Chain Sustainability School and Ecovadis certification process. Through these engagements, we continue to build knowledge, share insights, and enhance our approach to managing these risks.

8.0 Monitoring & Continuous Improvement

8.1 TSL recognises that addressing modern slavery is an ongoing process requiring continuous review and development.

During the reporting period, we strengthened our approach through the creation of the social compliance team. This role supports the implementation and monitoring of ethical labour standards across our UK operations, working closely with site teams, subcontractors, and central functions to support audits, onboarding, and compliance with labour legislation.

We continue to develop our approach to monitoring effectiveness and identifying areas for improvement. Our focus includes strengthening supply chain visibility, enhancing internal compliance processes, and further developing our policy framework.

We are committed to evolving our systems and controls in line with the risks inherent in the construction sector, including the gradual development of appropriate metrics to support ongoing monitoring over time.

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9.0 Horizon Scanning

9.1 Over the next reporting period, we will continue to assess and enhance the effectiveness of our approach to preventing modern slavery. Our priorities include strengthening due diligence processes, improving supply chain visibility, and further embedding awareness across our operations.

Building on the systems, standards, and controls implemented during 2025, TSL will focus on reviewing and enhancing the effectiveness of its existing modern slavery risk management framework. This will include ongoing evaluation of internal processes, monitoring mechanisms, and governance measures to ensure they remain proportionate, effective, and aligned with evolving regulatory and operational risks.

As part of TSL’s broader Social Compliance strategy, modern slavery KPIs will continue to be reviewed with senior leadership and the Board, with a focus on measuring the effectiveness of training, inspections, supply chain oversight, and compliance activities across operations and the supply chain.

10.0 Approval and Sign-Off

10.1 The prevention of modern slavery remains a priority for TSL’s senior leadership and governance structure. Responsibility for oversight of human rights, ethical labour standards, and modern slavery risk management sits with the Group Sustainability and Compliance Director, who is accountable for these matters at Board level and is responsible for reporting material risks, developments, and improvement opportunities relating to human rights and supply chain compliance to the Board of Directors.

This statement has been reviewed by senior management and is subject to Board-level review and approval as part of TSL’s ongoing governance and compliance framework.

Jackie Wild

Jackie Wild

Group Chief Executive Officer