



Ref: P014

TLS Modern Slavery Policy

Modern Slavery Policy

The Modern Slavery Act 2015 sets out the steps that TLS has 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. TLS 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

Our business supplies labour and vehicles to the traffic management industry predominantly in England. All personnel (partners) undertaking any work on our behalf will be imputed onto our FastLane system and checked for right to work, identity and qualifications are also checked before any commencement of work.

Our high risk areas

Traffic management is considered to be high risk by the nature of working and driving on public roads and motorways, in view of this we and or the organisation they are contracted to, ensure that all partners are qualified and drug and alcohol tested to mitigate the risk in these areas.

Our policies

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

- **Anti- Bribery, Fraud and Corruption Policy**
- **Money Laundering and Terrorism Financing Prevention Policy**
- **Drug and Alcohol Policy**

Specific Policies

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 (Fast Lane) 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 partners/employees and suppliers to act.

Our suppliers

Ref: P014

Revision No: 10

Date Issued: 17/01/2026

Approved By: PC



Ref: P014

TLS Modern Slavery Policy

TLS operates a supplier policy and maintains a preferred supplier list. 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 a particular organisation has never been convicted of offenses relating to modern slavery, and on site audits which include a review of working conditions where applicable. 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:

TLS ensure where practicable organisation we deal with;

1. Have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. 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 and Awareness

We regularly conduct training and or briefing for our procurement team so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

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.

Paul Chamley

A handwritten signature in black ink, appearing to read 'P. Chamley'.

Managing Director

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Ref: P014	TLS Modern Slavery Policy
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Appendix Section:

Identifying potential victims:

Question to consider as part of staff awareness with regard to modern slavery

1. Is the victim in possession of a passport, identification or travel documents? Are these documents in possession of someone else?
2. Does the victim act as if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?
3. Was the victim recruited for one purpose and forced to engage in some other job?
4. Was their transport paid for by facilitators, whom they must pay back through providing services?
5. Does the victim receive little or no payment for their work? Is someone else in control of their earnings?
6. Was the victim forced to perform sexual acts?
7. Does the victim have freedom of movement?
8. Has the victim or family been threatened with harm if the victim attempts to escape?
9. Is the victim under the impression they are bonded by debt, or in a situation of dependence?
10. Has the victim been harmed or deprived of food, water, sleep, medical care or other life necessities?

Ref: P014	Revision No: 10	Date Issued: 17/01/2026	Approved By: PC
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Ref: P014	TLS Modern Slavery Policy
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11. Can the victim freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

Ref: P014	Revision No: 10	Date Issued: 17/01/2026	Approved By: PC
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Ref: P014	TLS Modern Slavery Policy
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Revision History

Revision	Date	What has changed?	Who has written it?	Who has approved it?
00	24/05/2014	First Issue	QE&SH Manager	MD
01	25/06/2015	Reviewed	QE&SH Manager	MD
02	16/01/2016	Reviewed	QE&SH Manager	MD
03	05/01/2018	Reviewed	QE&SH Manager	MD
04	26/05/2020	Reviewed, updated to new document control format, name & signature of MD added	Systems Manager	MD
05	26/05/2021	Reviewed and TA logo added	Systems Manager	MD
06	26/05/2022	Reviewed	Systems Manager	MD
07	24/01/2023	New TLS Group Logo added	Systems Manager	MD
08	17/01/2024	Annual review	Systems Manager	MD
09	17/01/2025	Annual review	Systems Manager	MD
10	17/01/2026	Review	Systems Manager	MD

Ref: P014	Revision No: 10	Date Issued: 17/01/2026	Approved By: PC
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