



Modern Slavery and Human Trafficking Policy

Last updated Jul 2025

1. Purpose

TCS (Europe) Limited is committed to maintaining the highest standards of ethical conduct, including a zero-tolerance approach to modern slavery and human trafficking in any part of our business or supply chains. This policy reinforces our obligations under the UK Modern Slavery Act 2015, particularly Section 54, and outlines the steps we take to combat these serious human rights abuses.

2. Scope

This policy applies to all employees, contractors, suppliers, business partners, and stakeholders working with or on behalf of TCS (Europe) Limited.

3. Policy Statement

TCS (Europe) Limited is proud of its long-standing commitment to ethical trade practices, which includes the provision of safe working conditions and the protection of workers' rights. We expect the same high standards from our suppliers and partners.

Our operations are aligned with our Ethical Policy, which reflects internationally recognised standards, including those set out by the International Labour Organisation (ILO). All suppliers are required to comply with our Ethical Policy and Code of Business Conduct and must demonstrate their commitment to ethical and legally compliant business practices.

4. Responsibilities

Key employees have been identified to take primary responsibility for understanding, assessing, and monitoring risks related to modern slavery and human trafficking. These include:

- The Ethical Auditor
- Purchasing & Compliance Manager

These individuals oversee the implementation of this policy and ensure ongoing diligence across our operations and supply chains.

5. Risk Assessment and Due Diligence

We regularly assess the risk of modern slavery occurring in our business and supply chains. This assessment considers geographical, industry, and sector-specific risk factors. Our procurement process includes due diligence checks to verify supplier compliance with our ethical standards.



6. Training and Awareness

We conduct training for all employees to ensure awareness of:

- The risks of modern slavery and human trafficking
- Our Ethical Policy and related expectations
- The correct procedures for reporting any concerns

7. Supplier Expectations

Suppliers must:

- Comply with our Ethical Policy and Code of Business Conduct
- Prohibit the use of forced, bonded, or involuntary labour
- Ensure fair wages and safe working conditions
- Be open to audits and provide documentation demonstrating compliance

8. Reporting Concerns

All employees and partners are encouraged to report any concerns related to suspected modern slavery or human trafficking. Reports can be made confidentially to line managers, the HR department, or through a designated whistleblowing channel.

9. Compliance and Enforcement

Failure by employees or suppliers to comply with this policy may result in disciplinary action, termination of employment, or cessation of business relationships.

10. Review

This policy will be reviewed annually or as needed to reflect legal updates or changes in company operations. Our annual Modern Slavery and Human Trafficking Statement will continue to report publicly on our efforts and progress.

Jul 2025

Review Date: Jul 2026