

Modern Slavery Policy

Objective

At TXP, we are committed to combating modern slavery and human trafficking. This policy outlines the responsibilities and expectations for all employees to ensure we uphold our ethical standards and comply with the Modern Slavery Act 2015.

Policy

The purpose of this policy is to educate employees about modern slavery and human trafficking, outline their responsibilities, and provide guidance on how to report any concerns.

Scope

This policy applies to all persons working for TXP or any subsidiary company or on our behalf in any capacity, including employees at all levels, directors, officers and Associates, including but not limited to agency workers, seconded workers, volunteers, interns, contractors, external consultants, third-party representatives and business partners, sponsors or any other person associated with us, wherever located.

Definitions

Modern slavery can take many forms, including but not limited to:

- **Forced Labour:** Work performed involuntarily under threat of punishment.
- **Human Trafficking:** The recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat or use of force or other forms of coercion.
- **Debt Bondage:** A person's pledge of their labour or services as security for a debt.
- **Child Labour:** Work that deprives children of their childhood, potential, and dignity.

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Principles and responsibilities

All employees are expected to:

- **Understand the Signs:** Be aware of the indicators of modern slavery, such as restricted freedom of movement, unusual behaviour, poor living conditions, or lack of personal identification documents.
- **Act Ethically:** Conduct themselves in a manner that promotes respect and human dignity.
- **Report Concerns:** Immediately report any suspicions or evidence of modern slavery or human trafficking to the designated contact person.
- **Participate in Training:** Attend and engage in any training sessions provided by TXP on modern slavery and human trafficking.
- **Comply with Policies:** Adhere to all company policies and procedures related to ethical conduct and modern slavery.

Reporting

If you suspect that modern slavery or human trafficking is occurring within our business or supply chains, you should:

- **Report to Your Manager:** Inform your line manager or supervisor.
- **Contact the Designated Person:** Reach out to Jeroen Wolff, our designated contact for modern slavery concerns, at Jeroen.Wolff@txp.co.uk.
- **Use Whistleblowing Procedure:** If you prefer to report anonymously, use our whistleblowing procedure detailed in the employee handbook or available on the company intranet.

We are committed to providing support to employees who report concerns about modern slavery. We will ensure:

- **Confidentiality:** Your report will be handled confidentially to the fullest extent possible.
- **Protection from Retaliation:** You will be protected from retaliation or victimisation for raising genuine concerns.
- **Follow-up:** Appropriate action will be taken following any report of modern slavery or human trafficking.

Compliance

This policy will be officially monitored for compliance by the People Director and/or QIS Manager and may include random and/or scheduled audits.

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Non-Conformance

Any non-conformances will be analysed, root cause determined, and appropriate corrective actions taken.

All policies require the participation of staff and contractors to be successful. Any employee or associate found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

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