

1. Introduction

TELPASC is committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses. We are committed to ensuring that TELPASC and our partners, and any workers we supply (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.

We will provide appropriate training and awareness information for all of our employees.

This Policy will be reviewed and updated from time to time, to ensure it continually improves to support our aim in eliminating human rights abuse.

This Policy should be read in conjunction with our other policies including but not limited to; Ethical Trade Policy, Risk Management Policy, Human Rights Policy and Recruitment Policy.

2. Raising a Concern

All staff, workers or partners are strongly encouraged to report any concerns or suspicions that they might have to Gareth Hughes, ethero Managing Director and TELPASC board member - gareth.hughes@telpasc.com.

The TELPASC board are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we are committed to taking appropriate action, including but not limited to:

- Working with the appropriate organisations to improve standards
- Removing a client from our supply
- Passing details to appropriate law enforcement bodies.

3. Modern Slavery Statement

TELPASC is committed in tracking Slavery and Human Trafficking and we take full responsibility for ensuring that our culture and working practices comply with the Modern Slavery Act 2015. This Policy Statement reflects the commitment of our organisation to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective control systems to prevent Slavery and Human Trafficking is not taking place anywhere within our Company or supply chain.

3.1. Our Commitment

- To conduct regular planned, formal risk-based audits of our business and supply chain.
- Implement effective control systems to ensure that we do not support or deal with any business or individual knowingly involved in Slavery or Human Trafficking.
- Operate formal systems and recruitment practices in compliance with The Modern Slavery Act 2015, and relevant employment legislation.
- Carry out formal training and re-training all our staff in legislative and system compliance, awareness and understanding.
- Clear effective reporting mechanisms to enable the alerting of concerns related to possible or suspected Slavery or Human Trafficking activities.

4. Monitoring and Compliance

Modern Slavery Policy & Statement

TELPASC have in place a robust monitoring and compliance framework to ensure adherence to this Policy. Regular inspections, audits, and assessments will be conducted to assess compliance. Feedback from seasonal workers and stakeholders will be actively sought and used to improve the scheme's performance.

5. Training and Awareness

Where necessary, TELPASC will provide training and awareness campaigns to all stakeholders involved in the scheme, including employers, supervisors, and seasonal workers.

6. Continuous Improvement

TELPASC is committed to continuously improving its policies and practices and addressing any identified gaps or shortcomings in our processes. Feedback from seasonal workers, stakeholders, and independent assessments will be actively sought and used to inform policy revisions and operational improvements.