

Anti-Modern Slavery Policy

Tonbane Construction Services Ltd has zero tolerance to modern slavery, human trafficking, and all forms of corruption and bribery directly and indirectly associated with these criminal acts.

Much modern slavery isn't visible in public. Someone is in slavery if they are:

- Forced to work - through mental or physical threat.
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse.
- Dehumanised, treated as a commodity or bought and sold as 'property'.
- Physically constrained or has restrictions placed on his/her freedom of movement.

Modern forms of slavery can include debt bondage (where a person is forced to work for free to pay off a debt), child slavery, forced marriage, domestic servitude and forced labour (where victims are made to work through violence and intimidation).

Human trafficking involves men, women and children being recruited, harboured, or brought into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will.

The way in which companies operate can affect the likelihood of slavery being a part of the final product. If a contractor is given a substantial project with a short turnaround time beyond the contractor's capacity, this could increase the risk of slavery as the contractor may subcontract work where lower standards apply.

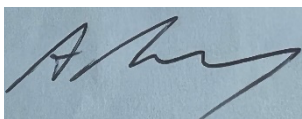
Contractors may negotiate such low prices that subcontractors push down the price paid for materials and labour, increasing the likelihood of the use of forced labour. Contractors have a responsibility of ensuring that no forced labour has been used in building their projects. This should apply not only to production on their own sites but also to their subcontractors and suppliers, all the way down the supply chain.

Responsibility for the policy

The Director of Tonbane Construction Services Ltd has overall responsibility for ensuring this policy complies with our legal obligations, and that all those under our control comply with it. Day to day the responsibility for identifying risk and contravention of our Policy lies with our Contracts Managers who are in the front line and in direct contact with those most at risk.

Compliance with the policy

Everyone working for Tonbane Construction must read, understand, and comply with this Policy. Everyone is encouraged to raise concerns about any issue or suspicion of modern-day slavery directly with the director of Tonbane Construction Services Ltd.



Signed

Date: 11.10.2022

Managing Director Responsible for Tonbane Construction Service Ltd Health, Safety and Environment