



Modern Slavery Policy (UK)

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Document Control Sheet and Version History

Version	Date	Owner	Comments
1.0	03/10/2024	Patricia Rogers	Reformatted and renumbered for new doc library
2.0	18/06/2025	Rebecca Mercer	Updated template format as part of audit actions
3.0	10/02/2026	Patricia Rogers	Addition of Section 4 - Identification and Management of High-Risk Labour Sourcing to comply with RISQS requirements.
4.0	16/07/2026	Patricia Rogers	Changed template due to re-brand, reference to D2 updated to new business name. Document references with prefix TR - changed to prefix TR

Version	Prepared by	Approved by
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1. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

2. Commitment

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015, the ILO (International Labour Organisation) and the UN (United Nations) guiding principles.

3. Suppliers/Contractors/Business Partners

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

TSA Riley Infrastructure conducts due diligence on all new suppliers through a pre-qualification process. All suppliers are asked to provide a modern slavery policy and details of procedures they have in place to manage modern slavery risks. If we are made aware of any allegations of human trafficking/slavery activities against any of our suppliers, then we would act immediately against the supplier and report it to the authorities.

4. Identification and Management of High-Risk Labour Sourcing

The Company recognises that certain labour sourcing arrangements present a higher risk of modern slavery. These risks may arise due to:

- Use of agency, temporary, migrant, or low-skilled labour
- Labour sourced from countries or regions with weak labour protection
- Subcontracting arrangements with limited visibility or oversight
- High turnover, unusually low pricing, or excessive working hours
- Recruitment practices involving fees charged to workers
- Reliance on labour providers or intermediaries

The Company will assess modern slavery risk by considering factors such as sector, geography, workforce type, supplier behaviour, and previous compliance issues.

Where high-risk labour sourcing is identified, the Company will implement proportionate control measures, which may include:

- Conducting due diligence on labour providers and suppliers
- Requiring suppliers to confirm compliance with modern slavery legislation and this policy
- Reviewing recruitment practices to ensure workers are employed freely, without coercion or recruitment fees
- Carrying out audits, inspections, or worker interviews where appropriate
- Including contractual obligations allowing the Company to investigate concerns and terminate relationships where serious breaches are identified
- Working with suppliers to address and remediate identified risks rather than disengaging where feasible

5. Awareness

TSA Riley Infrastructure have raised awareness of modern slavery by issuing posters across our offices and briefing our employees on the following:

- Our commitment in the fight against modern slavery and raising awareness.
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

6. Responsibilities

The CEO has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it, and has primary day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to line managers.

7. Compliance

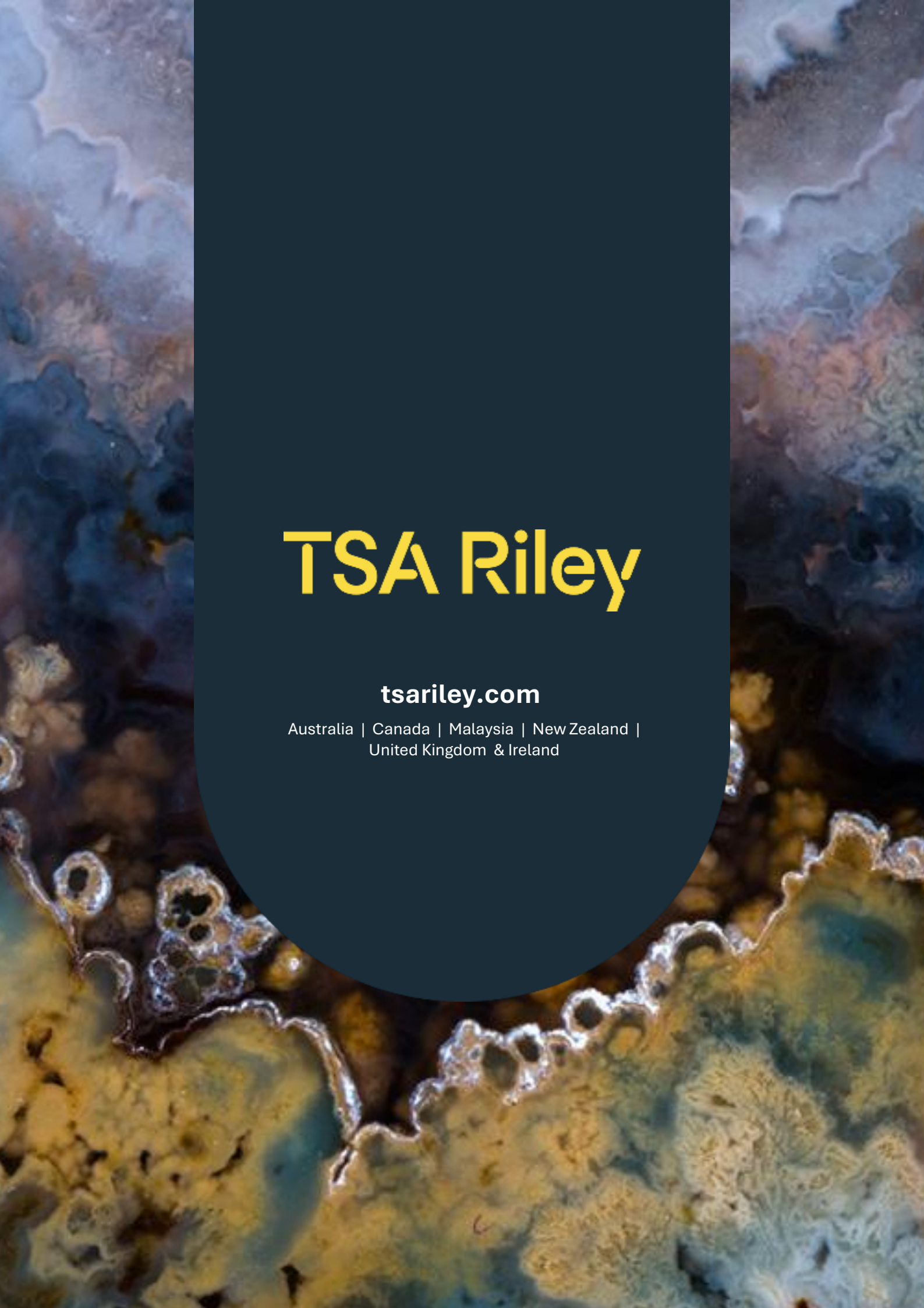
All employees must ensure they have read, understood, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. To report an instance of modern-day slavery, employees can speak to their line managers or call the Modern Slavery Helpline on 0800 0121 700.

Employees must notify their line managers as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future

8. Review of Policy & Procedures

This policy along with corresponding procedures will be reviewed at regular intervals for its effectiveness and compliance will be monitored through regular audits of the company's activities.

The background is an abstract, textured image with organic, cellular patterns in shades of blue, purple, and yellow. A large, dark blue circular shape is centered on the page, serving as a container for the text.

TSA Riley

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