

# COMPANY POLICY

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024-2025



### 1.0 STATEMENT

**TNG Consulting Engineers Ltd** recognises the Modern Slavery Act 2015 and the legal requirement for some businesses to publish a Slavery and Human Trafficking Statement to demonstrate compliance under section 54(1) of the Act.

Our annual turnover is currently significantly below the reporting threshold of £36M as set by the Government, therefore TNG has no legal requirement to publish a Statement. However, the Company wishes to communicate a Statement under the Act, in order to support the other trades and professions in Construction that do have an obligation to publish a Statement. It shall appoint a Director who shall be responsible for reporting. This Statement, therefore, is made in relation to section 54(1) for the current financial year.

### 2.0 ORGANISATIONAL STRUCTURE

TNG is a privately owned Limited Company providing Building Engineering Services Design Consultancy to the Construction industry. It is a small business with one office based in Southampton, in the UK. It provides its services to public and private sector organisations along the south coast of England and in the Channel Islands.

### 3.0 THE SUPPLY CHAIN

TNG is a supplier of knowledge, information and advice. It does not provide any physical goods. It supplies its services to public and private sector organisations on project specific contracts. It can be 'employed' by different types of Client such as building owners, commercial Developers, an Estates Team, an Architect, or a Project Manager etc.

The Company works as part of a Design Team, so its position in the chain is shared with other similar professionals that TNG works with collaboratively, but that are preselected by the Client.

TNG is also responsible for specifying engineering equipment, plant and machinery that may be manufactured and distributed in the UK or internationally.

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### 4.0 OUR POLICY

The Company has a zero tolerance Policy on any employment acts or omission that are unethical, immoral or illegal, and that may happen in our business, or by any organisation that we do business with; this explicitly includes Slavery and Human Trafficking.

Our Policy is communicated to our Clients, Colleagues, Employees and any other third party via our Business Ethics Policy available to view on our website at [www.tngconsultingengineers.co.uk](http://www.tngconsultingengineers.co.uk).

### 5.0 DUE DILIGENCE

In order to exercise due diligence, TNG engages the following practices:-

- TNG Employees work in one central location where the management team has direct control and supervision of all workers and working practices.
- TNG evaluates its suppliers prior to commencing any business relationship and only does business with organisations that can demonstrate their integrity.
- TNG shall only specify equipment, plant and machinery that is manufactured and distributed by reputable and industry recognised Companies. It shall examine its policies prior to specification when appropriate.
- Employees participate in Modern Slavery Training.
- TNG Employees are expected to report any malpractices or improper working activities that may be discovered during their work, whilst at a project site, or at another workplace.
- Where possible, we build long standing relationships with our Clients, Colleagues and Suppliers and make clear our expectations of business behaviour.

The Board has directed that the Company shall only be responsible for checking the integrity of the Supply Chain one level down from our position/role. It can be assumed that our larger Clients will check the Supply Chain as a matter of course, and they will vet all other Suppliers of goods and services employed on each contract, as they do us. It is not reasonably practicable for TNG to verify the integrity of every link in the supply chain of a construction project.

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### 6.0 ASSESSING THE RISK

It has been deemed that the highest risk of Modern Slavery and Human Trafficking occurring within our business industry is in the employment of manual labour associated with Construction, and the manufacture and supply of engineering equipment. This is where TNG shall apply most focus and shall undertake risk assessments in these areas.

TNG has implemented procedures to assess risk and these are integrated into our ISO 9001 Quality System. This ensures that checking for compliance with the Modern Slavery Act 2015 is a standard and audited activity within our business.

### 7.0 TRAINING

All Employees are required to participate in regular training so that they fully understand the improper activities that can occur under the definitions of Modern Slavery and Human Trafficking. They shall also be instructed how to report any suspected or discovered improper acts or activities.


### 8.0 RESPONDING TO AN INCIDENT

TNG has a zero tolerance policy on any employment acts or omission that are unethical, immoral or illegal. It shall reserve the right to terminate a business relationship or contract with any person or organisation if deemed necessary to do so. It shall also exercise its right and its duty to report any wrongdoing to the Police or any other official reporting organisations.

### 9.0 COMMITMENT

The Board of Directors delegated approval of this statement on its behalf to the Managing Director of the Company, and the publication of this statement and its implementation to the HR Director, at a Board meeting on 27<sup>th</sup> June 2016.

I confirm this is TNG’s published Modern Slavery and Human Trafficking Statement for the financial year 2023/2024 and approve its publication:-

Signed:  Name: Russell Pitman Date: 12-09-2024