

# Modern Slavery & Human Trafficking Statement

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## MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

### **1. Introduction**

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024.

The statement sets down TTC Groups commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Employees are expected to report their concerns and management to act upon them.

### **2. Organisational structure and supply chains**

This statement covers the business activities of TTC Group (UK) Limited and subsidiary companies.

TTC Group operates in the training and compliance sector within the UK. Our Head office is located in Telford, Shropshire. We have offices in Basingstoke, Hampshire and Richmond-upon-Thames, South-West London. Work is wholly carried out in the United Kingdom across all regions.

TTC Group is a private limited company and is controlled by a board of directors and an investment deal with Pricoa Private Capital, the private capital business of Prudential Financial.

TTC Group have a diverse range of supply chains that support our operations. TTC is committed to guaranteeing a sustainable, ethical and socially responsible approach to Supply Chain Management, ensuring that each supplier has sufficient economic standing and resources to maintain their own long-term business feasibility, and that they also share similar ethics with our own. Recognising that we ourselves form part of a larger, trusted Supply Chain, it is vital that we demonstrate the same exacting levels of professionalism and social awareness from our own suppliers, each supplier is vetted in the following areas:

- Environmental impact
- Adoption of a recognised Quality Management System
- Financial and Economic standing
- Self-cleaning of company Directors, operating history, pending legal actions
- Equality, Diversity & Inclusion
- Sustainability of Supply Chain
- Business Continuity and Risk Mitigation
- Data Security
- Disaster Recovery
- Relevant Legislation Compliance (HASAW, Equal Opportunities, Anti-bribery and Corruption, Modern Slavery, Discrimination)
- Community Involvement & Social Value Commitment
- Human Resources and Fair Recruitment

### 3. Definitions

TTC Group considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat.
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse.
- being dehumanised, treated as a commodity or being bought or sold as property.
- being physically constrained or to have restriction placed on freedom of movement.

### 4. Commitment

TTC Group acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

TTC Group does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to TTC Group in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. TTC Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.

### 5. Policies on Slavery and Human Trafficking

TTC Group are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy reflects our promise to act ethically and with integrity in all our business relationships and to ensure slavery and human trafficking are not taking place in our supply chains or in any part of our business.

### 6. Due Diligence Processes

TTC Group have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### 7. Risk Assessment and Management

Areas of our business and supply chains that are at risk of slavery and human trafficking have been identified. We have implemented the following steps to assess and manage that risk:

We consider the most significant part of TTC's supply chain is our NDORS course venues, which are sourced throughout each Force region. Supplier diversity is hugely

important to ensure that we offer the widest choice to clients. TTC is equally committed to delivering social value through our choice of venue locations.

Once a suitable venue has been identified, we have implemented the following steps to assess and manage that risk:

- Regional Manager will work in partnership with the venue's management team to help support their capabilities to ensure that TTC's exacting standards are met.
- Conducting regular audits of our suppliers
- Engaging with our suppliers directly on the subject of modern slavery.
- Providing training to our staff to help them identify and report any potential breaches of our policies.

In general, TTC considers its exposure to slavery/human trafficking to be relatively limited, nonetheless, we have taken steps to ensure that such practices do not take place in our business nor the business of any organisation that supplies goods and/or services to it.

## 8. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our employees. This training includes:

- Recognition of the risks of modern slavery and human trafficking in our business and supply chains.
- How to assess the risk of slavery and human trafficking in our business and supply chains.
- How to report concerns about slavery and human trafficking.
- Understanding the broader implications of encountering slavery and human trafficking in our supply chains or business.

## 9. Effectiveness and Performance Indicators

We have set the following key performance indicators (KPIs) to measure the effectiveness of our actions in ensuring that slavery and human trafficking are not taking place in our business or supply chains:

- All employees trained in modern slavery.
- Number of audits conducted on suppliers.
- Instances of non-compliance identified, and action taken.

## 10. Policies

TTC has the following policies which further define its stance on modern slavery. The policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

- **Whistleblowing policy** – TTC encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- **Corporate Social Responsibility (CSR) Policy** TTC's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.
- **Recruitment Policy** TTC recognises that our colleagues are fundamental to our success. Therefore, a strategic, professional approach to recruitment is essential

to do this.

**11. Slavery Compliance Officer**

TTC has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to our obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Jim Kirkwood  
Position: Chief Executive Officer  
Date: 24<sup>th</sup> October 2023  
Signature:

