

## MODERN SLAVERY/ ANTI-SLAVERY 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.

Tineke Training Ltd has 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.

We are also 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.

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, contractors, external consultants and business/ service associates.

### **Responsibility for the policy**

Tineke Training Ltd has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and overseeing 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.

### **Compliance with the policy**

This policy must be read, understood and complied with.

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 with us.

Any activity that might lead to or suggest a breach of this policy must be avoided. Furthermore, such activity actual or suspected must be reported to a Tineke Training Ltd Director as soon as possible.

Individuals are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. Anyone who comes forward with a genuine concern can do so safe in the knowledge they will be listened to and supported.

### **Communication & awareness of this policy**

Part of Tineke Training Ltd's commitment to zero-tolerance to modern slavery requires communication to all suppliers, contractors and external partners/ associates at the outset of our business relationship with them and reinforced as appropriate thereafter.

Internally and specifically to our business; when seeking training instructors, they must meet certain criteria to ensure they uphold the high standards of Tineke Training Ltd. This includes the candidate providing their full working history and experience (CV and qualification evidence). We check for anything that we feel needs further clarification and give the candidate the opportunity to explain anything that is of cause for concern in relation to modern slavery.

### **Breaches of this policy**

Tineke Training Ltd is respectful of all individuals regardless of their background. We adhere to zero tolerance of all forms of exploitation. Any breach of this policy i.e. detection or report of modern slavery is investigated immediately and steps taken to address the issue which, may require reporting to external organisations such as law enforcement.

Any employee or contractor who breaches this policy will face disciplinary action. This could take the form of dismissal or termination of contract for misconduct or gross misconduct. Regarding our supply chain and external partners; we will terminate our relationship and/or any contracts in place with them.

**Signed Off By:** Tineke Simmons (Director), 2022