

The Shore Group (TSG) refers to the following companies, and as such this policy applies to all listed companies:

The Shore Grp Solutions Ltd  
SPR Executive Ltd Trading as The Shore Group  
Shore Grp Resources LLP  
The Shore GRP (UK) LLP  
The Shore GRP Recruitment LLP  
The Shore Grp (Kent) Ltd  
The Shore Grp Holdings Ltd  
The Shore Grp LTD

## 1. Introduction

The Shore Group (TSG) was established in 2008 with the objective of delivering a tailored service to client and candidates, by placing temporary, contract and permanent staff within a range of sectors such as M&E, Construction, Engineers, Telecoms, Security, Aviation and Logistics.

We now employ 100 staff in distinct operations division with a clear management structure and resource over 20,000 clients' requirements each year.

## 2. Policy Statement

We are committed to eliminating modern slavery, human trafficking, forced labour, and similar human rights abuses. Modern slavery is a crime and a violation of fundamental human rights. All types of modern slavery have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We are committed to ensuring that our staff and any workers we supply (directly or indirectly) are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and similar human rights abuses.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. As part of this process, we have undertaken a review of our supply chain to identify and assess potential risk areas.

We expect high ethical standards from all our subcontractors, suppliers and other business partners such as respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by the suppliers' operations. We have made this a contractual term in our agreements with significant suppliers wherever possible.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Suppliers must ensure their business operations are free from

slavery and human trafficking practices whether in the UK or elsewhere, both internally and within their supply chains and other external business relationships.

**Whistleblowing:**

We encourage all employees, customers and subcontractors to report any concerns related to the direct activities, or the supply chains of, the business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. For more information, please refer to the Whistleblowing policy.

**Supplier code of conduct:**

We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The company works with suppliers to ensure that they meet the standards of the code and improve their workers' working conditions. Serious violations of the company's supplier code of conduct will lead to the termination of the business relationship.

### **3. Implementation**

#### **3.1. Supplier Due diligence**

The Shore Group undertakes due diligence when onboarding new suppliers and working with new subcontractors, as well as regularly reviewing its existing suppliers and subcontractors.

The company's due diligence and reviews include but are not limited to:

- Evaluating new suppliers for the risks of modern slavery and human trafficking both within their own business and their supply chain.
- Conducting supplier audits, assessments or reviews where the risk of modern slavery or human trafficking is identified.
- Working with suppliers where substandard practices are identified, providing advice and assisting in implementing corrective action plans.
- Where necessary invoking sanctions against suppliers who fail to improve their performance in line with an action plan or who seriously violate our supplier code of conduct with last recourse being termination of the business relationship.
- Participating in collaborative initiatives to help promote human rights and work with like-minded businesses to help eradicate modern slavery and human trafficking throughout the supply chain.

All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions. Suppliers and subcontractors should observe the provisions of the International Labour Organisation such that any young persons under the age of 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development. No young persons may be employed below the age of 16.

### 3.2. Our candidates.

We carry out strict compliance checks are carried for all candidates we supply. We verify the identity of each worker and their right to work before supply commences.

All slavery and human trafficking laws are complied with including, but not limited to, the UK Modern Slavery Act 2015.

### 3.3. Our internal processes,

All employees are provided with a clear contract of employment, which complies with local legislation. Employees are treated in a fair and equal manner and with dignity and respect. Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (including gender reassignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependants, religious belief or political opinion, age, trade union activity and offending background is prohibited.

### 3.4. Training

As part of our training and awareness programme, all members of staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management. All contracted labour operatives are made aware of types of modern slavery and human traffic practices via our registration form.

Any staff, workers or other parties are strongly encouraged to report any concerns or suspicions that they might have to our Compliance Team or via our anonymous reporting form.

Reports surrounding these issues are taken extremely seriously by senior leadership, who are committed to ensuring that all investigations shall be prompt and effective. If our investigations reveal any issues, we will take appropriate action, including but not limited to:

- Working with the appropriate organisations to improve standards,
- Passing details to appropriate law enforcement bodies.

We regularly monitor our risks in this area using relevant key performance indicators, including:

- The percentage of suppliers/ subcontractors who provide their own modern slavery and human trafficking statements,
- The level of modern slavery training and awareness amongst our staff.

## 4. Communication, approval and review

The Shore Group is committed to communicating, engaging and consulting with our employees and ensuring that everybody is aware of their individual responsibilities and commitments to help the business achieve its objectives and fulfil its obligations.

This policy is communicated to all employees as part of the onboarding process and is available on the Company Sharepoint as well as being available to all interested parties on the company website – [www.theshoregroup.co.uk](http://www.theshoregroup.co.uk).

This policy is approved by senior management and is reviewed annually to monitor its effectiveness and to ensure that it reflects changing needs and circumstances. This policy is effective immediately and supersedes all previous versions.

Name: James Hobden



Signature:

Position: Director

Date: October 2024