

Modern Slavery Policy

Globalisation has increased international trade, reduced borders, and reduced the price of travel; these influences have contributed to creating Push and Pull factors. By offering cheap travel and promises of a better life abroad, there has been an increase of individuals who end up in exploitative situations that they cannot escape from. As a result of this, Human Trafficking has quickly become the second most profitable criminal enterprise worldwide, surpassed only by the illicit drugs industry.

This policy of slavery and human trafficking is made in compliance with Section 54 of the Modern Slavery Act 2015 (the "Act"), in which we explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it.

This policy is on behalf of all companies within the TXM Group of Companies and identified within TXMG001. TXMG001 contains a list of associated companies and is available upon request.

Our Business

Established in 2005, the TXM Group consists of 17 companies, totalling over 400 staff located across regional hubs in the UK, Europe, America, Canada, Australia, and the Middle East. Providing specialist engineering and resource solutions, the business has gone from strength to strength, with a collective annual turnover now in excess of £200 million.

Over the past twenty years the TXM Group companies have grown a diverse team of professional staff and developed an award-winning approach to delivering a variety of services, across a number of industries.

Currently providing contract, interim and permanent recruitment solutions, as well as infrastructure and project support within a range of specialist areas. We work across the following sectors: Engineering, Manufacturing, Rail, Aerospace, Automotive, Defence, Marine, Motorsport, Healthcare, Oil & Gas, Rail, IT, Technology, Procurement, Finance, Commercial, Transport, Building services, Facilities management, Construction. With our expertise and commitment to always going "The Xtra Mile", our entire workforce is focused on providing the very best solutions and adding value for our customers in the industries we serve.

Our supply chains include, but are not limited to, companies sourcing candidates for our clients. This may involve the introduction of external agencies to the TXM Group for onward supply to our clients. We therefore expect our suppliers to operate in a principled, legally compliant and professional manner by adhering to our Sustainable Procurement Policy, and to advocate similar standards within their own supply chains. The TXM Group relies on its employees to be vigilant in monitoring potential risks, with employees expected to immediately report any concerns, in line with relevant company policies and procedures.

Our Mission and Values

Our mission is to be a leading global provider of bespoke services exceeding both client and candidate expectations. We will achieve this by focusing on and committing to:

- Working in collaboration with our clients
- Supporting and developing our professional workforce
- Continually striving for excellence



- Seeking new challenges and expanding our business
- Adding value to industry and clients

In accordance with our values as outlined in our Corporate Social Responsibility, TXM is committed to acting with integrity, professionalism, fairness, and respect across all business functions.

Adherence to the Modern Slavery Policy

At TXM, we are committed to ensuring that there is zero modern slavery or human trafficking in any part of our TXM Group of businesses or in our supply chains.

We are committed to ensuring that a consistent Company-wide and professional approach is adopted across all business functions when dealing with matters of slavery and human trafficking.

The TXM Group commits to respect human rights and labour rights in accordance with the International Bill of Rights, the International Labour Organisation's Core Conventions and the United Nations General Principles. We expressly prohibit modern slavery, including forced labour, child labour and human trafficking, working to prevent this in our organisation and supply chain.

We abide by our professional Corporate Social Responsibility policy and industry Code of Professional Conduct, which outlines our core values and principles to act responsibly, honestly and fairly when conducting our business. All of our employees are required to adhere to these rules and understand its importance to the professionalism and reputation of our brand.

We understand the importance and impact of partnership working. Our suppliers, contractors and other business partners are therefore expected to comply with the same high standards. As part of our recruitment processes, we specifically prohibit against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Our Modern Slavery Policy is shared on our website and distributed to our clients and suppliers.

TXM will ensure that any partnership entered into, any supplier used and/or those who work on behalf of or provide a service to TXM will be aware of this Modern Slavery Policy. Furthermore, they are required to demonstrate adherence to our standards, principles, and values for them to be able to continue with their working relationship in any guise with TXM.

Our Modern Slavery Policy reflects our Company's commitment and deals with the implementation and enforcement of effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our business and in our supply chains. TXM will not use or work with any third party that does not adhere to the principles and standards of this policy.

Our Approach

Our approach to tackling the risk of slavery and human trafficking within our business involves understanding the potential modern slavery risks related to our business and implementing and maintaining company processes to preclude any slavery and human trafficking from occurring within the Group's business and its supply chains. This includes:

- Comprehensive staff training in the form of classroom learning and e-learning modules, which are updated regularly to capture any changes to our obligation as an employer and business;

- Spotting and supporting potential victims of trafficking and modern slavery;
- Providing the Police force with information on victims of human trafficking with the assurance of a quality focused investigation and appropriate support tailored to each individual's needs regardless of age, gender, ethnicity, sexual orientation and cultural or religious background;
- Requesting suppliers abide by our Supplier Code of Conduct and requiring suppliers to carry out due diligence in their supply chains;
- Ensuring that our suppliers and contractors are alert to the risks of slavery and human trafficking and communicate to us the steps they are taking to address this issue;
- Following robust placement processes including compliance checks, identity checks and greater scrutiny of higher risk placements;
- Having a dedicated contractor on-boarding team which provide independent evaluation of placements and a secondary direct contact for the worker to report any concerns regarding slavery and human trafficking.
- Maintaining oversight at Group level through our Management and HR team to whom all employees can address issues of concern;
- Maintaining a whistleblowing policy and procedures to support staff and contractors who raise any concerns; and
- Engaging with other organisations and professional bodies to learn and share best practice, including membership of the Recruitment and Employment Confederation and the Association of Professional Staffing Companies.

Assessment of Risk

The Group assesses whether or not particular activities or countries are particularly high-risk in relation to slavery and human trafficking. In doing so, consideration is given to the services provided over the duration of the contract and the supply chain involved. Consideration is also given, where possible, to suppliers' current compliance through a review of their website, their available code(s) of conduct and other available information, including:

- A code of conduct that addresses slavery
- Sourcing policies that address slavery
- Demonstrable management processes in place to manage the risk of slavery in their supply chain
- Modern slavery risks of occurrences identified by the media or risk monitoring organisations

Responsibilities

Responsibilities for TXM Group's anti-slavery initiatives are as follows:

- Policies: Group Management and HR, with advice and input from the legal teams as appropriate, are responsible for ensuring Group policies are up to date and reflective of the Modern Slavery Policy.
- Training: The People Development team are responsible for ensuring the workforce receive relevant, applicable and up to date training in relation to the Modern Slavery Policy.
- Monitoring and Compliance: the Directors and Managers within each entity are responsible for monitoring compliance with the Modern Slavery Policy.

Reporting Concerns

It is the responsibility of all employees within the TXM Group to report any concerns they have regarding modern slavery. This can be done by contacting a member of the HR team directly, or through the whistleblowing policy.

Monitoring and Feedback

TXM is committed to ensuring that all suppliers either have or adhere to the principles and standards of this Modern Slavery Policy. In addition to this, TXM will ensure that all employees, consultants or those who work on behalf of TXM qualify and have the relevant entitlement to work in the UK (or other relevant place of work), which is evidenced by a number of original legal documentation which is reviewed by an employee of TXM.

TXM is committed to ensuring that all employees are paid at a prevailing rate of pay for any work activity undertaken.

TXM is committed to ensuring that suppliers and recruitment processes are monitored and assessed to ensure that this Modern Slavery Policy is both implemented and adhered to.

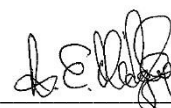
To assess the effectiveness of the steps we are taking to prevent modern slavery and human trafficking within our business and supply chains, TXM will report to the Board of Directors any reported incidents, as well as the outcomes of investigations into these reports. This includes any concerns raised through TXM's whistleblowing or grievance mechanisms. While in most cases these will be reported by the HR team, all Directors have a responsibility to raise concerns at Board level.

Any reports that are investigated in the 12-month period preceding each Modern Slavery Statement, regardless of outcome, will be recorded in the Modern Slavery Policy. In the past 12 months there have been zero reported incidents.

Variation of Policy

TXM reserves the right to make amendments to this policy at any time and in accordance with business and legislation changes.

Signed:



Andrew Midgley
Group Managing Director