



Tivoli Group Limited is a truly stand-alone grounds maintenance business. Tivoli provides grounds maintenance services nationwide for a variety of customers/clients. It employs around 1200 employees in the UK. Further details are available from our website:

<https://www.tivoliservices.com>

### 1. Policy Statement

- 1.1 Modern slavery is a crime and a gross 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. We have 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.
- 1.2 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, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors and subcontractors, external consultants, third-party representatives, and business partners.
- 1.4 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### 2. Responsibility for the Policy

- 2.1 Our Compliance Team and the Senior Management Team have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 Our Compliance and HR Team has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the Compliance Team.

### **3. Supply Chain**

3.1 Tivoli recognises that the support of our suppliers is intrinsic to eliminating slavery and we have put in place a robust assessment and audit system for our supply chain.

3.2 Our supply chains include providers of goods and sub-contracted services to enable Tivoli to deliver professional ground maintenance services to a range of public and private sector Clients. Where we utilise subcontractors, we have formalised procedures for selecting, assessing, and auditing our suppliers on an on-going basis.

3.3 All our suppliers, consultants or direct sub-contractors undergo a basic pre-qualification which obtains and evaluates basic details regarding company profile, financial status, client base and value, health and safety, HR, Quality etc. We expect to incorporate specific Customer requirements (e.g. around special security issues such as DBS checks) to ensure we operate an approved supplier list in conjunction with the contract requirements.

### **4. Compliance with the Policy**

4.1 You must ensure that you read, understand, and comply with this policy.

4.2 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 under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

4.3 You must notify the Compliance Team if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

4.4 You 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.

4.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify the Compliance Team or report it in accordance with our Whistleblowing Policy immediately.

4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Compliance Team or report it in accordance with our Whistleblowing Policy.

4.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Team. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

## 5. Communication and Awareness of this Policy

- 5.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will form part of the induction process for all individuals who work for us. We will provide training annually thereafter.
- 5.2 Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 6. Breaches of this Policy

- 6.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Where appropriate we may also notify the relevant authorities.
- 6.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy. This policy statement will be reviewed on a regular basis to ensure its continuing suitability.

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This policy has been approved and authorised by:

Name: Nicola Keach  
Position: Chief Executive Officer  
Date: 20<sup>th</sup> April 2023

Signature: *N. Keach*

Date	Reviewed by:	Title:	Reviewed & signed by:	Title:	Amendments
26/02/21	Cathy Dawson	HR Director	Darren Cunningham	CEO	N/A
17/08/21	Cathy Dawson	HR Director	Spencer Rock	COO	N/A
24/01/22	Cathy Dawson	HR Director	Nicola Lovett	CEO	N/A
04/05/22	Cathy Dawson	HR Director	Nicola Keach	CEO	1
20/04/23	Cathy Dawson	HR Director	Nicola Keach	CEO	2