



1. Introduction

- 1.1 Modern slavery encompasses slavery, human trafficking, forced labour, and other forms of exploitation. The company condemns these practices in all their forms and is dedicated to ensuring that they have no place in our business operations.

2. Purpose

- 2.1 Tivoli Group LTD is committed to preventing modern slavery and human trafficking in all aspects of its business and supply chain. This policy outlines our commitment to ethical practices and our approach to identifying and addressing any instances of modern slavery within our organisation or associated with our operations.
- 2.2 Tivoli Group LTD will communicate its zero-tolerance approach to modern slavery both internally and externally. This includes sharing our policies and progress in combating modern slavery with stakeholders, customers, and the public. It will also maintain effective systems and controls to ensure slavery is not taking place anywhere in our business and supply chains.

3 Responsibilities

- 3.1 The responsibility for preventing modern slavery and human trafficking extends to all levels of our organisation. Senior Managers are accountable for establishing and promoting a culture of zero tolerance towards modern slavery, while employees are expected to be vigilant and report any concerns.
- 3.2 This policy also applies to all contractors, suppliers, and other business partners associated with Tivoli Group LTD. It is intended to guide behaviour and decisions, emphasizing the importance of transparency and compliance with relevant laws and international standards.

4 Employees

- 4.1 Within Tivoli, the majority of employees are employed on permanent contracts. The greatest risks of modern slavery exist for workers not in permanent employment, meaning those on fixed term, agency, or temporary contracts.
- 4.2 We are, however, committed to continuous improvement in our efforts to combat modern slavery. This includes regularly reviewing and updating our policies, procedures, data analysis and due diligence processes to address emerging risks and challenges.
- 4.3 We have in place systems to:
- Identify and assess potential risk areas in recruitment processes
 - Mitigate the risk of slavery and human trafficking occurring through our payroll processes
 - Monitor potential risk areas in our day-to-day business.
 - Protect whistle blowers.
- 4.3 The company encourages employees, contractors, and suppliers to report any concerns related to modern slavery through established reporting mechanisms. Whistleblowers will be protected, and reports will be thoroughly investigated.

5. Supply chain

- 5.1 The company is also committed to conducting due diligence to identify and assess the risk of modern slavery within our supply chain. This includes evaluating the practices of existing and potential suppliers and taking appropriate action to address identified risks.
- 5.2 We 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.
- 5.3 We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. All suppliers will be onboarded/re-assessed using a tool which includes adherence to the MSA, Supplier Code of Conduct and other social driven initiatives. Our Terms and Conditions of business for suppliers and subcontractors cover compliance with the MSA legislation.
- 5.4 Suppliers with spend in the high-risk categories are considered for further, more intrusive visits and audits. Other checks may include Credit Checks, online investigation, other supplier client discussions to name a few.
- 5.2 We expect our suppliers and business partners to share our commitment to combating modern slavery. Contracts with suppliers will include clauses requiring compliance with applicable laws related to slavery and human trafficking, and we will actively engage with suppliers to ensure adherence to these standards.

6. Training

- 6.1 For the policy and procedures to be effective it is essential that any employee who is involved in any aspect of the recruitment and/or selection of staff is aware of this policy and applies the following key principles.
- 6.2 Appropriate training, development and support will be given where required to those involved in recruitment and selection activities to meet Company standards.

This policy has been approved and authorised by:

Name: Nicola Keach

Position: Chief Executive Officer

Date: 29th April 2024

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
19/04/24	Andrea Crinnion	Business Support & Change Director	Nicola Keach	CEO	1