

This statement is published in accordance with Section 54 of The Modern Slavery Act 2015.

TP Group plc and its subsidiaries (“the Group”) are opposed to slavery, human trafficking and the use of forced labour of any kind. The Group has established policies and processes throughout our business and supply chains in support of this position and this statement outlines the approaches we have taken in 2019 to prevent modern slavery and ensure human trafficking is not taking place in either.

Introduction

The Group recognises its responsibility to take reasonable steps to ensure that slavery and human trafficking is not occurring in any part of our business or supply chains.

The Group has 2 main divisions across multiple sites in the UK and mainland Europe:

- 1) Our Technology and Engineering division designs and manufactures heat exchangers, pressure vessels, innovated air management systems, industrial computer servers and RAID data storage systems for use around the world, in a wide range of sectors including oil and gas, nuclear and defence.
- 2) Our Consulting and Programme Services division is primarily involved in the supply of technical consultants to deliver complex solutions for customers in defence and space.

Group policies

Our ethical principles are contained in our Code of Conduct and includes specific reference to the UK Modern Slavery Act 2015. Our employees, and those we do business with, are required to comply with this Code, and it is referenced that if employees suspect a breach they are to invoke our Whistleblowing Policy. The Group ensures that all reported breaches are dealt with efficiently, effectively and consistently.

We also have a Supply Chain Policy whereby we ask the supplier to declare that slavery and human tracking are not taking place within their business or their supply chain in line with the Modern Slavery Act 2015.

Modern slavery in our business – risk assessment and due diligence

To drive the right behaviours across the business, our supply chain and legal teams undertake due diligence reviews of suppliers and overseas agents, and our standard terms and conditions of contract/purchase include provisions regarding compliance with (inter alia) the Modern Slavery Act 2015.

We have recently appointed a Group Security Controller to ensure all our employees and any consultants we use undergo rigorous security checks to ensure that they are legally allowed to work in the UK, before they are engaged and allowed to go onto customer sites thus reducing the risk of human trafficking

Senior management visited our locations a number of times during 2019 and no potential modern slavery or human trafficking issues, or indicators of such issues, were identified at any. However, we are conscious that we need to guard against complacency and remain diligent in this regard and so are therefore reviewing both how we make sure we are effective in looking for the signs of potential slavery and human trafficking and how we ensure such behaviour does not occur in our business. This includes consideration of how we might better use other risk information, for example from: supplier audits, supplier questionnaires, safety audits, security checks etc to increase our understanding of the risks and potential issues in the business.

Monitoring

We monitor generally the supplier landscape and particularly note any geographic or market areas where there is a higher risk of slavery or human trafficking issues so that we can guard against these within our supply chain.

Legal compliance

We continue to require our suppliers to comply with the laws and regulations applicable to them and to meet minimum standards in relation to modern slavery, human rights, anti-bribery, tax evasion and corruption, employment practices, data protection, cyber securities, health and safety, quality, and the environment. We also expect our suppliers to check that their sub-suppliers comply with the laws and regulations applicable to them.

The requirements described above are set out in our Supplier Questionnaire. Also in 2019, we updated the UK standard terms of conditions of purchase, requiring our suppliers to comply with GDPR Legislation. We intend to update the terms again in 2020 to include Modern Slavery Act compliance.

Training

HR are sourcing training courses to roll out to our procurement teams and those involved with our supply chains, to help them better identify modern slavery, and take the appropriate the action. In 2020 we will consider rolling this out more broadly to our employees to raise further awareness on modern slavery.

The Modern Slavery Act – Transparency in Supply Chain statement

This statement is made on behalf of TP Group plc and its subsidiary companies in accordance with the obligation to make a modern slavery statement under s54(1) of the Modern Slavery Act 2015.

Signed:  _____