

Telent Technology Services Limited t/a Telent

EXTERNAL

ANTI-SLAVERY POLICY

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1. Policy statement

Modern slavery is a crime and a 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 are committed to acting ethically and with integrity in all our business dealings and relationships. We implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring that 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 of our contractors, suppliers and other business partners. 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.

Our responsibilities include:

- maintaining clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation (including but not limited to our recruitment procedures and policies relating to equality, diversity, inclusion, bullying and harassment, wellbeing, speaking up against actual or suspected malpractice and/or breach of this policy (see <https://telent.com/speak-up>), bribery, corruption and tax evasion and ensuring an open and transparent grievance process);
- ensuring our employees have the freedom to terminate their employment;
- prohibiting the use of worker-paid recruitment fees, compulsory labour and child labour;
- signposting suppliers/external workers to representation – details can be found under our Supplier Ethical Code of Conduct (a copy can be found at <https://telent.com/our-policies>);
- providing access to remedy, compensation and justice for victims of modern-slavery through our Speak Up Policy and Remediation Plan;
- checking our supply chains (including regular audits and compliance with our Supplier Ethical Code of Conduct) to ensure the potential for slavery and human trafficking is significantly reduced;
- ensuring all our supply contracts contain an anti-slavery clause which must be flowed down through all layers of our supply chain;
- leading by example by making pre-employment checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us;
- seeking to raise awareness so that our colleagues know what we are doing to promote their welfare; and
- publishing our annual Modern Slavery and Human Trafficking Statement setting out steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, supply chain and our customers seriously.

Our Modern Slavery and Human Trafficking Statement, Supplier Ethical Code of Conduct and Speak-Up Policy can be found at <https://telent.com/our-policies>

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, external consultants, third-party representatives and business partners.

2. Responsibility for the policy

The Telent Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

There is a dedicated Compliance Team consisting of individuals from Legal and Commercial, Human Resources and Procurement.

The Compliance 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.

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.

3. Compliance with the policy

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

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.

There is no typical victim and some victims do not understand if they have been exploited and are entitled to help and support. Here is a non-exhaustive list of signs that could indicate someone may be a slavery or trafficking victim:

- the person is not in possession of their own passport, identification or travel documents;
- the person is acting as though they are being instructed or coached by someone else;
- they allow others to speak for them when spoken to directly;
- they are dropped off at and collected from work;
- the person is withdrawn or they appear frightened;
- the person does not seem to be able to contact friends or family freely;
- the person has limited social interaction or contact with people outside their immediate environment.

Although the above are key signs, it does not necessarily mean that a person is a victim of slavery or trafficking. You will need to carefully assess the circumstances which may indicate if something is not right.

You must notify a member of the Compliance Team or your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

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.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify a member of the Compliance Team or your line manager or report it in accordance with our Speak Up Policy (<https://telent.com/speak-up>) as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

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 primary contact at Telent or in accordance with the Speak Up Policy.

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.

4. Communication and awareness of this policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Breaches of this policy

We reserve the right to terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6. Remediation Plan

See Modern Slavery Remediation Process (Appendix 1)

Issue	Date	Change Descriptions	Author	Reviewed by	Approved by
1	JUNE 2016	First Issue	HR Compliance		Director of HR Director of Legal and Commercial
2	APRIL 2021	Updated responsibilities and new section on monitoring our procedures. Second Issue.	Legal Advisor	HR Compliance / Responsible Procurement and Sustainability Manager	Director of Legal and Commercial
	FEBRUARY 2022	Annual Review - 'Internal' added to front page. No material change.	Legal Advisor	Head of HR Service Delivery Responsible Procurement and Sustainability Manager	Director of Legal and Commercial
3	DECEMBER 2022	Clarification on: <ul style="list-style-type: none"> Where to find our policies freedom to terminate employment contracts prohibition of worker paid recruitment fees, compulsory labour and child labour access to remedy including Speak Up Policy and Remediation Plan Addition of Remediation Plan.	Legal Advisor	Head of HR Service Delivery Responsible Procurement and Sustainability Manager	Director of Legal and Commercial
4	March 2024	Update to Responsible Procurement Policy now called Supplier Ethical Code of Conduct. Other minor changes.	Legal Advisor	Employee Relations Manager Responsible Procurement and Sustainability Manager	Director of Legal and Commercial
5	March 2025	Minor amendments to Remediation Plan (For 'Internal Concerns' raised)	Legal Advisor	Employee Relations Manager Responsible Procurement and Sustainability Manager	Director of Legal and Commercial
6	March 2026	Review – no change	Senior Legal Counsel	-	Commercial Director

Appendix 1 - Modern Slavery Remediation Process

Stage 1: Definition of a Complaint

Talent defines a complaint as a report of violations against our Codes of Conduct that has occurred in our operation or supply chain and has a direct, adverse impact on human rights. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.



Stage 2: Concern Raised

Through our Speak Up policy, employees are advised to raise their concerns with their line manager/supervisor or HR in the first instance. Alternatively, they may contact the Group Financial Controller or Director of Legal and Commercial directly. Subcontractors and their employees should initially speak to their Telent contact, call our general enquiries line on 0800 783 7761 or email procurement@telent.com for the attention of our Senior Environmental, Social & Governance (ESG) Procurement Manager.

If for any reason the complainant feels they cannot raise concerns via these channels, our secure and confidential reporting service should be used, which is operated by an independent third-party. The service is free to use, user-friendly, completely anonymous and confidential if requested, available 24 hours a day, 365 days a year and provided in a range of languages.

To raise a concern, freephone **0808 196 3757** or [click here](#) to file a report online.

If there is a serious risk of physical harm to an individual, all employees and suppliers should call 999 or their local emergency services.



Stage 3: Assessment by Modern Slavery Compliance Team

Once a concern is received, an initial review will be carried out by our Modern Slavery compliance team within 24 hours to understand the scale of the issue and if immediate action is needed. Confidentiality will always be maintained.



Stage 4a: Potential instance of Modern Slavery that requires investigation

Stage 4b: Serious issue or violation reported

Investigate

Our Modern Slavery Compliance team will carry out a formal internal investigation

Escalate to Senior Management

Serious reports will be escalated to the Senior Management team within 12 hours and dealt with as soon as possible



Investigation Process

Internal Concerns

If related to employees or contractors, HR (including Talent Acquisition) will support the investigation to obtain the facts and any evidence (including statements from those affected where appropriate) concerning potential violations and agree a plan for any corrective actions with an agreed time frame, led by the Compliance Team.

External Concerns

If concerns relate to a supplier or sub-tier supplier, our Senior Environmental, Social & Governance (ESG) Procurement Manager will carry out a Responsible Sourcing Audit. Where possible, our suppliers will also be subject to an onsite Supplier Quality Assurance (SQA) audit led by our trained auditors.

If violations are identified, our Procurement team will support suppliers to implement a corrective action plans to resolve them within an agreed time. If suppliers fail to improve their performance in-line with an action plan, we reserve the right to terminate the business relationship.

If investigations identify serious concerns, issues or violations, then we will escalate to Stage 4b

Seek Expert Guidance

As successful remediation is difficult and requires a victim-led, consultative and multi-stakeholder approach, the process will be decided on a case-by-case basis and led by our Compliance Team.

We will work collaboratively with all relevant parties to seek a resolution. If a victim is happy to do so, we will work with local law enforcement authorities, social services and healthcare parties and the National Referral Mechanism to investigate and address any instances, ensuring that affected workers are not further harmed during the process.

Our policies and third-party helpline also signpost workers to sources of independent representation and advice if this is preferred. Throughout the process, we will seek guidance from Unseen UK, a leading modern slavery charity working with survivors, businesses, governments, police and NHS.

Where suppliers are involved, we reserve the right to terminate the business relationship immediately.



Stage 5: Lessons Learned

Following any report, the Modern Slavery Compliance team will conduct a "Lessons Learned" review to establish any improvement actions for our policies and procedures to prevent reoccurrence.

