

## Modern Slavery and Human Trafficking Policy - 2021

### Policy Statement

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, contractors, and suppliers. It has been published using the principles of the Modern Slavery Act of 2015.

TCM Living strongly support the Ethical Auditing Systems based on the ETI base code. We have a zero-tolerance approach to modern slavery and human trafficking in our operations and supply chain. We have, and will continue to be committed to, implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. The Company will not support or trade with any organisation or business that are believed to be involved in these practices.

### Commitments

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel to exploit them soon after. Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

Modern slavery is a crime and a violation of fundamental human rights.

TCM Living are a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct. If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Name: Mark Smith  
Signature:



Position: C.E.O.  
Date: 19<sup>th</sup> March 2021