

Advance TRS Anti-Slavery and Human Trafficking Policy

1. Introduction

This policy applies to everyone employed by Advance TRS or working on our behalf in any capacity. This includes, but is not limited to, all employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners. It is essential that this policy is read, understood, and complied with in its entirety.

The Advance TRS Board of Directors has overall responsibility for ensuring compliance with our legal and ethical obligations under this policy, and for ensuring that all individuals under our control also comply.

2. Modern Slavery Act 2015

The Modern Slavery Act 2015 defines and prohibits four key activities:

- **Slavery:** Exercising ownership powers over a person.
- **Servitude:** Coercing an individual to provide services under obligation.
- **Forced or Compulsory Labour:** Requiring work or services from a person under threat of penalty, without their voluntary consent.
- **Human Trafficking:** Arranging or facilitating another person's travel for exploitation.

Modern slavery is the illegal exploitation of individuals for personal or commercial gain. It manifests in various forms, including forced employment, sexual or criminal exploitation, and domestic servitude. Victims may experience:

- Unacceptably low pay or no pay at all.
- Excessive wage deductions leading to unmanageable debt.
- Poor working conditions.
- Humiliation or ill-treatment.
- Squalid living conditions.
- Confiscation of identity documents.

3. Responsibilities

3.1. Company Responsibilities

Advance TRS is committed to:

- Maintaining robust policies and procedures to prevent exploitation and human trafficking, and to protect our workforce and reputation.
- Implementing a professional, transparent recruitment process.

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Advance TRS Ltd. Womersley House, The Guildway, Old Portsmouth Road, Guildford GU3 1LR
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- Monitoring our supply chain annually.
- Conducting appropriate checks on employees, recruitment agencies, suppliers, and contractors.
- Ensuring an open and transparent grievance process.
- Raising awareness among employees about promoting welfare and safeguarding contractors.
- Maintaining a whistleblowing policy to ensure confidential reporting of concerns.

3.2. Manager Responsibilities

Managers are responsible for ensuring that their teams understand and comply with this policy. For employees working in high-risk areas, managers must provide appropriate training. Managers will:

- Listen and remain approachable to contractors.
- Respond appropriately to concerns indicating potential exploitation.
- Stay alert to signs of slavery.
- Raise awareness through discussion and training, enabling employees to recognise and report signs of trafficking and exploitation.
- Use their experience and judgment to assess situations appropriately.

3.3. Employee and Consultant Responsibilities

All employees and consultants must:

- Be vigilant for signs of modern slavery within the workforce or supply chain.
- Report concerns to their line manager or a main board director, including situations where:
 - Workers lack written employment contracts.
 - Workers have paid fees to secure employment.
 - Workers cannot prove their legal right to work in the UK.
 - Workers show signs of physical abuse, malnourishment, or unkempt appearance.
 - Workers appear frightened or hesitant to communicate.
 - Workers are regularly dropped off or collected at unsocial hours.
 - A large number of workers live at the same address, indicating high shared occupancy.
 - Agencies charge suspiciously low rates compared to industry standards.

If you believe more can be done to prevent exploitation, report your concerns immediately.

4. Supply Chain Management

Advance TRS is committed to reducing the potential for slavery and human trafficking in our supply chains. We:

- Communicate zero tolerance for exploitation.
- Include anti-slavery clauses in all supplier contracts, prohibiting slavery and human trafficking.

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- Conduct annual supply chain reviews.

5. Recruitment Practices

Advance TRS ensures:

- All staff have written contracts of employment.
- Right-to-work checks are conducted for all employees, ensuring legal eligibility to work in the UK.
- New recruits are informed of their statutory rights, including sick pay, holiday pay, and other benefits.

If exploitation is suspected during the recruitment process, the HR department or recruiting manager will follow established reporting procedures.

6. Reporting Slavery or Human Trafficking

If you suspect someone is in immediate danger, call 999. Otherwise, discuss concerns with the Group Operations Director, who will determine the appropriate course of action. It is essential to:

- Avoid taking independent action that could jeopardise the safety of potential victims.
- Maintain confidentiality and ensure that reporting does not put anyone at further risk.

Advance TRS supports individuals who raise concerns in good faith, even if the suspicions are mistaken. We are committed to protecting anyone who reports suspected cases from any form of retaliation or detrimental treatment.

7. Training

All staff will be briefed on this policy and receive training as required. Employees involved in recruitment processes or working in high-risk areas will receive additional training on identifying and responding to modern slavery concerns.

8. Policy Review

We will review this policy annually to ensure its effectiveness. Updates and changes will be communicated to all staff, and relevant training will be provided as necessary.

Andy Ridout



Managing Director

January 2025

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