



## MODERN ANTI-SLAVERY & ETHICAL TRADING STATEMENT

### Modern Slavery Act

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

Integrity is one of TLG's core company values and this means that we will conduct our business lawfully and ethically. In accordance with this commitment we will respect human rights in our business operations and business relationships.

TLG will not knowingly support or deal with any business which is involved in slavery or human trafficking.

Most of our supplies are sourced from the UK, Europe and Thailand in sectors we believe to be low risk, but we are looking pragmatically at our supply chain processes to give us added confidence that they help us address the requirements of the Modern Slavery Act. We have adopted a risk-based approach to this exercise and are not currently undertaking any specific training in relation to these matters.

We acknowledge that due to the diverse nature of our supply chain it is not possible to effectively mitigate all external risk. As such we will work with our suppliers both in the UK and internationally to ensure that they commit to our and industry standards and review schedule. We will continue to review and manage risk, both internal and external, as part of our annual review schedule or as and when circumstances arise.

We would expect our suppliers and manufacturers to be affiliated to sedex (supplier ethical data exchange) <https://www.sedexglobal.com/modern-slavery-act-briefing/>

Our larger suppliers who are involved in supplying UK supermarkets are members Ethical Trading Initiative <https://www.ethicaltrade.org/> and as such work within the organisation guidelines as well as being audited by the supermarkets they supply.

TLG's recruitment processes are transparent and reviewed regularly. We have robust procedures for vetting new employees, ensuring that we are able to confirm their identities and rights to work in the UK. We monitor our temporary work agencies to ensure legislative compliance and suppliers employing or providing non-UK nationals undergo appropriate investigation to understand their recruitment methods and their management of permits and working visas.



If we discovered, or were made aware, that we had been associated with human rights violations, including any acts of modern-day slavery and human trafficking in the supply chain, we would take steps to rectify the situation, taking account of the interests of those whose rights are being violated.

This statement has been approved by the company Directors and will be reviewed annually, unless circumstances dictate it should be reviewed and/or renewed more frequently.

## COMPANY STANDARDS

- Suppliers shall comply with all relevant legislation, through national law and practice.
- Wages and working hours shall comply with national laws, including minimum wage, overtime and maximum hours.
- Employment shall be freely chosen. There shall be no forced or compulsory labour and workers must be free to leave their employer after reasonable notice.
- Employees should have the right to join or form a staff association or trade union, nor should any Employee suffer any detriment as a result of joining, or failing to join, any such organisation.

## ETHICAL TRADING POLICY

- Suppliers shall respect their workers' rights to freedom of association and the right to collective bargaining. Where this is restricted under law, the employer shall facilitate alternative means for independent and free association and bargaining.
- Systems and procedures to ensure a healthy and safe working environment shall be implemented by employers and reviewed regularly.
- Suppliers shall have an environmental management system in place and are encouraged to report on their environmental performance.
- In respect of child labour, suppliers shall conform to the provisions of the ILO Convention 138 Minimum Age for Admission to Employment.
- Suppliers must ensure that discrimination, harsh or inhumane treatment of any employees is prohibited, and systems are in place to prevent this.
- Employees shall receive written confirmation of their terms of employment including pay, conditions, hours and where applicable benefits.



- The responsibility for the implementation of the Ethical Trading Policy shall therefore rest with the Directors and Managers of the Company in conjunction with nominated staff.

Ian Leigh

Managing Director  
Thai Leisure Group



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