



INTEGRATED MANAGEMENT SYSTEM

Anti-Slavery and Human Trafficking Policy

Document Control

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Document Information

Field	Detail
Document title	Anti-Slavery and Human Trafficking Policy
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Standards covered	Modern Slavery Act 2015
Owner	Chloe Sayer – Project Manager
Approved by	Nicholas Love – Managing Director
Classification	Controlled

Revision History

Version	Date	Description of Change	Approved By
01	23/07/2026	First controlled issue	Nicholas Love

Approval

By approving this document, the undersigned confirms that the Integrated Management System described herein is adequate, appropriate and effective for the organisation, and authorises its use.

Role	Name & Signature	Date
Prepared by Project Manager	Chloe Sayer	21/07/2026
Reviewed by Managing Director	Nicholas Love	23/07/2026
Approved by Managing Director	Nicholas Love	23/07/2026

1. Purpose and Scope

Testa Limited does not tolerate slavery, servitude, forced or compulsory labour, human trafficking or child labour in any part of its business or its supply chain.

This policy applies to all employees, contractors, agency workers, suppliers and anyone acting for or on behalf of Testa.

Testa's turnover is below the £36m threshold at which a Modern Slavery Act 2015 section 54 transparency statement is mandatory. This policy is adopted voluntarily, and to meet customer and supply-chain qualification requirements.

2. Our Commitment

- Comply with the Modern Slavery Act 2015 and related employment legislation.
- Use no forced, bonded, trafficked or child labour, and engage with no one who does.
- Ensure everyone working for Testa is free to leave, is paid at least the National Minimum or National Living Wage, and is paid directly into an account in their own name.
- Charge no worker any fee to obtain work with Testa.
- Retain no worker's passport or identity documents.
- Expect the same standard of every supplier, agency and contractor.

3. Where the Risk Sits

Area	Assessment
Direct employment	Low. Small, directly employed, UK-based workforce, recruited directly and paid through payroll.
Contract and agency labour	Main risk. Contractors are engaged for two-person work such as rope access and confined space entry, sometimes at short notice, which is where due diligence is most likely to be rushed.
Supply chain	Moderate, low visibility. Equipment, consumables and PPE manufactured overseas; peripheral services such as cleaning and waste.

4. What We Do

4.1 Recruitment and employment

- Right to work checks on every new starter, with original documents seen.
- Payment direct to an account in the individual's own name — never a third-party or shared account.
- No recruitment fee charged to any worker; written terms issued; no identity documents retained.

4.2 Contractors and agencies

- Competence and identity evidence obtained **direct from the individual** before mobilisation (see IMSHSP-TL-01, section 4.3).
- Confirmation that the contractor is paid directly, and at or above the minimum wage.
- Agencies asked to confirm compliance with this policy and with the Employment Agencies Act.
- Engagement terms permit immediate termination for breach.

4.3 Suppliers

- Modern slavery expectations form part of supplier approval, alongside registrations.
- Overseas and higher-risk suppliers are asked to confirm their own policy and controls.
- Supplier performance and any concerns are reviewed at management review.

5. Warning Signs

- A worker appears to be under another person's control, or someone else speaks for them.
- Wages paid into an account not in the worker's name, or into one account shared by several workers.
- No identity documents, or documents held by someone else.
- Signs of fear, injury or malnourishment; reluctance to talk about employer, hours or pay.
- Groups transported to and from site together and housed in poor or overcrowded accommodation.

6. Reporting a Concern

Do not investigate or confront anyone. Report what you have seen — you do not need to be certain, and no one raising a concern in good faith will suffer any detriment, even if the concern turns out to be mistaken.

- Report to the Managing Director or Project Manager as soon as possible.
- If anyone is in immediate danger, call **999**. Otherwise call the police on **101**.
- Modern Slavery Helpline: **08000 121 700** — confidential, 24 hours.

7. Responsibilities

Role	Responsibility
Managing Director	Overall accountability for compliance. Approves supplier and contractor engagement. Decides on reporting to the authorities.
Project Manager	Carries out and records due diligence on contractors, agencies and suppliers. Maintains this policy and briefs it at induction.
Everyone	Remains alert to the warning signs on Testa and customer sites and reports concerns promptly.
Suppliers and contractors	Comply with this policy and can demonstrate compliance on request.

8. Breaches, Related Documents and Review

- Breach by an employee may be treated as **gross misconduct**. A supplier or contractor in breach has their engagement terminated, and the matter is referred to the authorities.
- Related: IMSHSP-TL-01 Health and Safety Policy; IMSM-TL-01 IMS Manual; IMSABP-TL-01 Anti-Bribery and Corruption Policy; supplier approval records.
- Issued at induction and on every revision; available to customers and interested parties on request. Reviewed at least annually.