

Modern Slavery Statement

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1 Purpose

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 as required by UK law. It constitutes True North Partners LLP's and all its subsidiaries (together referred to as TNP) slavery and human trafficking statement. TNP acknowledges that modern slavery in all its various forms such as slavery, servitude, forced and compulsory labour, is a crime and constitutes a violation of fundamental human rights.

TNP is committed to a zero-tolerance approach to modern slavery by acting ethically and with integrity in all business relationships by enforcing effective controls and system to ensure that modern slavery is not taking place within TNP or any of our supply chains.

This policy applies to TNP personnel and partners, individuals working on behalf on TNP such as contractors, suppliers, business partners and third-party representatives.

2 Responsibilities

The responsibility for ensuring that the policy complies with legal and ethical obligations is shared between the partner-group.

All TNP personnel must notify the partner group when they believe or suspect a breach of this policy has occurred or may occur. When unsure if a particular act, the treatment of staff or working conditions constitute any of the various forms of modern slavery, raise it with HR (hr@tnp.eu).

3 Policies

TNP's policies aim to minimise the risk of modern slavery within TNP and also in our supply chain, e.g. Employment Equity Policy, Employment Policy.

4 Due Diligence

TNP is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to acting ethically and with integrity in all its business relationships.

TNP uses a wide range of suppliers who supply goods for sale, provide services at events and support our operations. We continue to monitor suppliers we believe present high modern slavery risks in our supply chain.

All suppliers which we class as high risk must:

- Complete our Modern Slavery Act Due Diligence Questionnaire which covers their governance, policies, training and supply chain management processes; and
- On an annual basis and prior to sourcing, provide full detail of the supply chains they are proposing to commission goods or services from on behalf of TNP.

Should a supplier fail to provide the information requested or to meet TNP's expectations, TNP will take appropriate action, which may include not entering into a relationship or terminating the relationship with the supplier concerned.

5 Training

During the year, we have continued to provide advice and guidance to those teams who have direct responsibility for relevant supply chains and we have conducted modern slavery training. We also maintain a Modern Slavery Act Guidance document which is available to staff through TNP's intranet.

6 Breaches of this policy

Any breaches of this policy will be followed by disciplinary action, which could result in dismissal for misconduct or gross misconduct.

7 Looking Ahead

We will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

True North Partners LLP

20-22 Wenlock Road
N1 7GU London UK

Phone +44 207 193 7392
Fax +44 207 681 2123

www.tnp.eu
info@tnp.eu