POL 00 006 - Modern Slavery Transparency Statement

Introduction

This statement demonstrates T&M Bowser Solutions' ongoing commitment to tackling slavery and human trafficking in line with Section 54(1) of the Modern Slavery Act 2015. It outlines the proactive steps we are taking to safeguard human rights within our business and supply chain operations.

We are a plant hire company based in West Sussex that specialises in providing Bowser Solutions for large-scale rail and infrastructure projects.

We are an intuitive and fast-growing company, involved in a multitude of commissions throughout the UK, including high profile government projects.

Factors that pose risk to the prevention of Modern Slavery within our industry

Statistics show that 47% of all potential victims in the UK Construction Industry, were trafficked into forced labour[1]. It is important that we recognise these statistics and make efforts to prevent them. T&M act under the Construction Industry Scheme (CIS), as we outsource parts of our workforce. We strive to ensure that contracted staff benefit from the same policies as our direct employees, and that their wellbeing is equally as prioritised. Additionally, operating within the construction industry means that part of our workforce is subject to extended hours, out of hours, and physically demanding work. It is necessary to establish the individual has voluntarily chosen the field in which they work, and are not subject to back-to-back shifts, out of our provision and against their will.

We recognise that the construction industry faces elevated risks of forced labour, particularly among subcontracted or temporary workers. To mitigate this, we take active measures, including ensuring all workers are aware of their rights, monitoring work conditions, and preventing exploitative practices such as excessive hours or coerced employment.

Company structure and our responsibilities

All workers have a responsibility to comply with the Code of Conduct and should be alert to the risks presented by Modern Slavery in our business and the wider supply chain. Staff are encouraged to report any concerns to management, who are expected to act upon them appropriately. The management structure within T&M showcases how we all have a duty of care and responsibility towards our peers and colleagues.

Our Modern Slavery Team consists of members from key areas of the business, including Recruitment, HR, Operations, Health & Safety, and Compliance. The Team meet on a regular basis and are responsible for the way our business manages all aspects of Modern Slavery. They ensure due diligence of our internal processes, covering not only our supply chain, but also the recruitment, onboarding, training, safety, wellbeing and offboarding of all employed and contracted workers.

Our directors at T&M play a crucial role in preventing Modern Slavery in the workplace by establishing policies, fostering a culture of transparency and responsibility, and ensuring compliance with relevant laws. The directors always lead by example by prioritising ethical decision-making.

Our department managers are consistently monitoring the working conditions and wellbeing of their staff, remaining vigilant during employee pre-employment checks and ensure training is completed and standardised across the board. Our department managers also act as a beacon to all staff, providing a safe and confidential contact to report any concerns.

The whole workforce have a duty to adhere to T&M's Code of Conduct, and report any concerning behaviours. It is compulsory for everyone to undertake Modern Slavery awareness training to know what to look out for. The workforce at T&M treat everyone with fairness and respect, creating a safe and happy environment for our co-workers, and providing a space to openly come forward without judgement.

Due diligence in our internal processes

We undertake rigorous action to prevent Modern Slavery and human trafficking at T&M throughout our day-to-day operation.

- During recruitment, candidates are prompted to apply through trusted job advertising sites, we have a thorough, end-to-end interview process where workers are asked to provide identification that match the contact details on the application, and we always carry out direct face to face checks.
- Every worker is subject to pre-employment checks to confirm their identity and ensure their right to work in the UK. This includes them being able to provide evidence that they are in possession of their own identification documents. Every worker is required to bring with them their passport on their first day, and only a copy taken by their employing manager is accepted as part of their check.
- Upon onboarding, and should any details change, we ensure that bank account details provided for payment match the name of the worker. If discrepancies arise, we investigate to ensure the worker is not subject to Modern Slavery. Where documents which link the employee with the payee cannot be provided, and in instances where more than one worker is being paid into a single bank account, it is escalated to Director level to investigate further.
- All workers are issued with written terms and conditions, they are given a copy for their own records, and can obtain another copy from our HR Department at any time, during and/or after the duration of their contract.
- All workers are provided with information about their statutory rights, including sick pay, holiday entitlements, parental leave, and any other benefits to which they may be entitled.
- In addition to our induction process, Modern Slavery training is mandatory for everyone. Any signs of potential victims will be verified by the Operations Department on a confidential level. Our company induction also offers internal and external helplines should a worker wish to come forward for advice.
- As well as our whistleblowing policy, we provide workers with safe and confidential spaces to obtain financial, legal, workplace, and health advice. Workers are made aware of the support available as part of the induction process, our internal wellbeing campaign, regular toolbox talks, posters and via our company newsletters.
- We choose to work with the Lighthouse Construction Industry Charity, who provide workers with 24/7 support, should they need it. It is also available to their families as part of an EAP programme.
- Our HR database holds the sensitive information of all workers, therefore we have the ability to raise any discrepancies in the system, replication of details such as mobile telephone numbers, next of kin details, address and bank details. They are then raised for further investigation.
- Upon a worker leaving, we ask for resignation letters direct from the individual, hold exit interviews and ensure workers fulfil their notice period where appropriate.

Compliance and conformity

Suppliers (including their subsidiaries or subcontractors) are expected to act in accordance with the Company's Code of Conduct, or an equivalent of its relevant core principles in the performance of any agreement.

We administer thorough reviews of our processes and our supplier approval procedure.
Our Pre-Qualification Questionnaire is sent out periodically to both suppliers and contractors in order of gravity to T&M. We require recipients to confirm that they are acting appropriately so that exploitation and trafficking does not occur directly, or in their supply chain. We also ensure they provide evidence of their Modern Slavery Policies and Statements as part of the process, remaining diligent and aware of any non-conformities.

A tier system is applied to all our suppliers on a significance basis – with the input from all core sectors of T&M. Full assessment is carried out on the suppliers prior to approval, and we require suppliers to comply with all relevant laws and regulations. Where appropriate, we also warrant that our suppliers hold certifications from creditable providers.

Our Action Plan

Should any evidence arise that a worker of T&M is subject to Modern Slavery, we have an action plan in place to ensure that we take the right course of action for both the victim and the perpetrator.

Victim – Upon sufficient evidence, we will direct the individual toward the correct contact to help, we will report any findings to the police so that they can provide the correct support for the individual. They'll get medical care and help arranging accommodation in a safe place, away from their traffickers. Our charity of choice provides around the clock counselling for both the individual and their family.

Perpetrator – If we should find evidence that somebody is participating in trafficking or exploitation of labour workers, we will do our best to disrupt their operation by reporting it as a crime.

Internal Processes – In the event of the exploitation of a T&M worker, we will address and review our internal policies and procedures to ensure that we couldn't have done anything to help the individual sooner. Just like we do with any other policy, it is important that we review this on a regular basis to make sure we are always doing our best, and continually improving to safeguard our workforce.

We regularly review our action plan, with updates conducted biannually to ensure alignment with evolving legislation and best practices. Our collaboration with the Lighthouse Construction Industry Charity ensures immediate and comprehensive support for victims.



Terry Beasley
Managing Director – 23 Sept 2026

1 – National Referral Mechanism Statistics

Risk Area	Description	Risk Level (Low/Medium/High)	Current Controls/Measures	Additional Actions Needed	Responsible Person	Review Date
Recruitment and Onboarding	The risk of hiring individuals subjected to modern slavery through improper recruitment practices.	Medium	- Rigorous identity and right-to-work checks. Face-to-face interviews. Mandatory Modern Slavery training for all employees.	- Continuous training updates. Periodic audits of recruitment processes.	HR Manager	Quarterly
Supply Chain Management	Risk of suppliers and subcontractors engaging in modern slavery practices.	High	- Adherence to Code of Conduct by suppliers. Pre-Qualification Questionnaires. Regular supplier audits.	- Enhance supplier vetting procedures. Increase frequency of supplier audits. Require suppliers to provide evidence of Modern Slavery Policies.	Health & Safety Advisor	Bi-Annually
Extended Hours and Physical Demands	Risk of forced labour due to extended working hours and physically demanding tasks.	Medium	- Monitoring of working hours. Ensuring voluntary engagement in work. Regular reviews of working conditions.	- Implement more robust monitoring systems. Provide additional support and rest periods for demanding tasks.	HR Manager	Quarterly
Reporting and Whistleblowing	Risk of under-reporting modern slavery incidents due to lack of awareness or	Medium	- Confidential reporting channels. Support and protection for whistleblowers. Regular awareness campaigns.	- Increase awareness and training on reporting mechanisms. Enhance support systems for whistleblowers.	Health & Safety Advisor	Quarterly

	fear of retaliation.					
Worker Rights and Conditions	Risk of workers not being aware of their rights and conditions, leading to potential exploitation.	Low	- Clear communication of terms and conditions. Information on statutory rights provided. Access to internal and external support.	- Regular updates on workers' rights. Periodic reviews of communication effectiveness.	HR Manager	Annually
Data and Information Security	Risk of exploitation due to mishandling of sensitive worker information.	Low	Secure HR database. Regular checks for data discrepancies. Escalation procedures for data issues.	- Enhance data security measures. Increase frequency of data audits.	IT Manager	Annually
Supplier Compliance	Risk of non-compliance with anti-slavery standards by suppliers.	High	- Tiered assessment of suppliers. Regular compliance reviews. Supplier training on modern slavery.	- Develop stricter compliance criteria. Increase engagement with high-risk suppliers.	Health & Safety Advisor	Bi-Annually
Victim Support	Risk of inadequate support for identified modern slavery victims.	Medium	- Established support contacts and processes. Partnership with external support organizations.	- Strengthen victim support protocols. Regular training for handling victim cases.	HR Manager	Quarterly

Perpetrator Handling	Risk of ineffective handling of individuals involved in trafficking or exploitation.	Medium	- Reporting to authorities. Internal disciplinary procedures.	- Review and improve handling procedures. Increase coordination with law enforcement.	Health & Safety Advisor	Quarterly