

## **Introduction from the CEO**

This statement sets out TM Group UK Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2022 to 31 December 2022.

Slavery and human trafficking remains a hidden blight on our global society but more recently has become more prevalent. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Employees are expected to report concerns, and management are expected to act upon them.

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of TM Group (UK) Limited with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term 'modern slavery' has the meaning given in the Act. As TM Group (UK) Limited has an annual turnover in excess of £36m, we are required by the Modern Slavery Act 2015 to provide a statement of intent to all of our employees and suppliers.

The organisation is absolutely committed to preventing slavery and human trafficking. We also ensure that our supply chains are free from slavery and human trafficking.

## **Our Company**

TM Group (UK) Limited provides online solutions to customers at every stage of the property transaction. Our head office is in Swindon and our business comprises of IT (Development, Infrastructure and Service Desk), Operations, Finance, Sales (covering England and Wales), Marketing and HR. Under TM Group (UK) Limited we also include Conveyancing Data Services Limited and our Scottish business, Property Searches Scotland.

## **Our Supply Chains**

TM Group (UK) Limited is not in an industry with a high risk of modern day slavery. Our supply chain includes obtaining property searches from Local Authorities and other professional Search providers, outsourced payroll, office stationery providers, IT Vendors, recruitment consultants, site maintenance contractors, cleaning contractors, external storage, kitchen supplies and waste disposal. Where suppliers are required to make their own statements in accordance with the Act, we monitor the content of the statements published.

## **Our Policies on Slavery and Human Trafficking**

Our Anti-Slavery statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **Due Diligence Process on Slavery and Human Trafficking**

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

As part of our initiative to identify and mitigate risk:

- we have three offices, TM Group (UK) Limited in Swindon, Conveyancing Data Services Limited in Twyford and Property Searches Scotland in Glasgow. We have senior managers based at all sites to ensure optimum control of the work environment.
- where possible, we build long standing relationships with local suppliers and customers and make clear our expectations of business behaviour.
- with regards to supply chains, our point of contact is preferably with a UK company or branch, and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the chain.
- whistleblowing procedure –the Company's Whistleblowing Policy is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by workers in this manner without fear of retaliation. The Whistleblowing Policy applies to all workers and can be found on the Company's SharePoint site.

### **Supplier Adherence to our Values**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. The Executive Team and all managers are responsible for compliance in their respective departments and for their supplier relationships.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant Employees. All Directors are briefed and are aware on the subject.

### **Our Effectiveness in combatting Slavery and Human Trafficking**

We communicate with the next link in the supply chain and monitor their understanding of, and compliance with, our expectations to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

This statement for Financial Year End 31 December 2022 has been approved by our Executive Team, who review and update it annually.

Signed:

11 January 2022



**Joe Pepper**  
Chief Executive Officer