

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Terra Firma has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Terra Firma has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business. Terra Firma is a Geotechnical and Geoenvironmental Consultancy that operates throughout the UK with offices in Cardiff, Exeter and Portsmouth.

'At risk' areas of operations. Terra Firma accept that due to the nature of our operations, we are exposed to certain risks of modern slavery and human trafficking, particularly in the following areas:

- *Supply Chain and Procurement of Materials*- Due to us relying on materials, equipment and labour, we recognise that there may be areas or suppliers who pose a higher risk
- *Subcontracting and Labour Hire*- Terra Firma use subcontractors to meet project demands and we understand that this area of the business is one which we have less control over.
- *Recruitment and Employment Practices*- During our recruitment processes, we understand that both our internal and external efforts can be open to Modern Slavery and Human Trafficking as we utilise both in-house and third party agencies. Those from vulnerable groups, such as migrants or refugees may be at higher risk.

Our Commitments and Controls

Our policies- Terra Firma operate a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Ethical Employment Policy Statement.**

This policy sets out the organisation's stance on:

- Modern Slavery and Human Rights Abuses
- Employment Practices
- Procurement
- Safeguarding and Escalation

- **Recruitment and Selection policy.**

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced

to work against their will

- **Whistleblowing policy.**

We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our suppliers and sub-contractors

Terra Firma operates a Supplier / Subcontractor Selection and Approval Procedure and maintains an approved Sub-Contractor and Supplier Register. We conduct due diligence on all suppliers before allowing them to become approved and carry out a robust annual review. As part of our due diligence, we conduct an online search to ensure that the particular organisation has never been convicted of offenses relating to modern slavery.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems, policies and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains. In addition, we plan to explore the introduction of an e-learning training module to add to our compliance training. This will also be added as part of the induction process, to improve employee awareness.

Our performance indicators: We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Document Approval & Review

We will continually review and update our approach to ensuring that our supply chain is free from modern slavery and human trafficking as our businesses and the inherent supplier risks change over time.

The company will review this policy at least annually and revise it as often as appropriate

Signed: 

Position: Director

Date: 02/10/2024