	Name	Modern Slavery Policy	Author	Christopher Sharp
	Number	P02	Approver	Christopher Sharp
	Version	1	Issue Date	12/12/24
			Effective Date	10/09/2025

1.0 SCOPE

This policy applies to all activities carried out by TCD Medical and covers all employees, contractors, agency staff, and temporary workers engaged by the company. It also extends to suppliers, subcontractors, and other third parties with whom TCD Medical conducts business. While TCD Medical does not directly manufacture goods or operate in high-risk sectors, the company recognises its responsibility to prevent modern slavery and human trafficking within its operations and supply chains. The policy therefore applies to:

- Recruitment and employment practices at TCD Medical.
- Procurement of goods and services, including logistics, equipment, and facilities.
- Supplier relationships and third-party engagements.
- The scope of this policy is global, applying to all TCD Medical operations and supply chain partners, regardless of geographic location.

2.0 RESPONSIBILITIES

The responsibility for setting and enforcing the modern slavery policy and ensuring staff are aware of it lies with the Quality & Operations Director although it is the responsibility of each staff member to work toward the aims of the policy

3.0 PURPOSE

The purpose of this policy is to demonstrate TCD Medical's commitment to ethical business practices and to the prevention of modern slavery and human trafficking in all its forms. Although the company is not legally required to publish a Modern Slavery Statement, TCD Medical recognises the importance of maintaining high standards of integrity and accountability in its operations and supply chains.


This policy aims to:

- Set out TCD Medical's zero-tolerance approach to modern slavery and human trafficking.
- Ensure fair and ethical treatment of all employees, contractors, and third-party workers.
- Establish expectations for suppliers and business partners to uphold the same principles.
- Promote transparency in recruitment, procurement, and supply chain practices.
- Protect the reputation of TCD Medical by aligning with best practices in corporate responsibility.

4.0 THE POLICY STATEMENT

TCD Medical is a rapidly growing distribution company based in Manchester England specialising in homecare, medical and pharma transport.

We take our brand very seriously because our identity is based on maintaining a customer focused approach. We want to grow without compromising on service but also all the time committing to our corporate social responsibility

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TCD Medical believe transparency is the best way we can ensure the public that we are doing our best as an ethical corporate citizen. We have published our annual statement for slavery and human trafficking, made in compliance with section 54 of the Modern Slavery Act 2015, in which we explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it.

We have a small but dedicated workforce, and our focus is on providing services to companies based in the UK. This allows us to focus our oversight and influence on one geographic region.


We have around 6 people within our organization and many more through the supply chain. Where possible, we engage suppliers who have relationships with existing suppliers so that we can contain our supplier network and improve consistency in ethical practices throughout the supply chain.

Building on our existing corporate social responsibility policy and our commitment to the Ethical Trading Initiative, we have embraced the requirement to publish an annual slavery and human trafficking statement. This will allow us to share our efforts against slavery and human trafficking and improve and measure our success each financial year.

This year we have developed our Slavery and Human Trafficking Policy; we updated our Supplier Code of Conduct. It sets out clear objectives for 1-, 3- and 5-year slavery and human trafficking plans around the following themes:

- Relationships: Strengthening our supplier engagement process
- Feedback: Establishing grievance mechanisms and channels for individual worker feedback
- Knowledge: Improving our knowledge base by collecting relevant data and improving product traceability
- Measurable change: Developing verifiable KPIs to measure progress
- Supplier collaboration: Encouraging suppliers to collaborate to address slavery and human trafficking issues
- Incentivisation: Developing mechanisms to incentivise employees and suppliers to address slavery and human trafficking and improve labour standards
- Accountability: Establishing a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking

We understand that our biggest exposure to Modern Slavery is in our supply chains. As a relatively young company we can check all our new suppliers, and we ensure they are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and factories/sites. These audits assess compliance with the Global Sourcing Principles and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

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We will identify the extent of any slavery and human trafficking in our supply chains by collaborating with 2 of our suppliers to develop an improvement plan to address new and previously identified slavery and human trafficking issues and by conducting an annual review questionnaire for existing suppliers to understand suppliers' self-assessment of slavery and human trafficking issues, allowing us to better identify slavery and human trafficking issues as they develop over time and to collect supplier-provided data to track improvement in suppliers' attitudes.

To assess the effectiveness of our modern slavery measures we will be reviewing the staff training levels and the number of slavery incidents reported in the supply chain

A key part of our slavery and human trafficking strategy is to promote cultural change through training. We aim to deliver online training modules on modern slavery to all staff this year

TCD will assess all suppliers before contracting and as part of tender exercises to establish adherence to local and national laws, freedom of workers to terminate employment, freedom of movement, freedom of association. Suppliers must prohibit any threat of violence, harassment and intimidation, prohibit the use of worker-paid recruitment fees, prohibits compulsory overtime, prohibits child labour, prohibits discrimination, prohibits confiscation of workers original identification documents, and ensures suppliers provides access to remedy, compensate victims of modern slavery

TCD will ensure that training incorporates shows members of staff to look out for the signs of Modern Slavery when searching for suppliers. TCD must not unintentionally contribute to Modern Slavery by ignoring key indicators that an organization may subject their employees to poor recruitment practices, poor working conditions and low pay for workers


These conditions include: aggressive pricing that does not consider sustainable production costs, short lead times, late high-volume orders, inaccurate forecasting, late or extended payments, withdrawing from contracts last minute, unfair penalties for not meeting orders despite last minute changes, accuracy of technical specifications

TCD will consider modern slavery issues at different stages of the procurement process to help reduce risks for the business. For example, during the tender stage, TCD will factor in labour costs in to their procurement and consider whether the price they are paying for goods and services are so low that the supplier (or the suppliers) are likely to be exploiting workers


Where TCD is alerted that one of their suppliers/customer is causing modern slavery, and is cooperating with authorities, actively implementing corrective actions and is not found to be complicit, TCD will not immediately delist or suspend trade with that supplier because of that specific incident however will create a service level agreement to formally give a specific time frame and with a specific response.

5.0 APPENDICES

5.1 Version History

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Old Version	Obsolete Date	New Version	Issue Date	Reason for changes	Distribution List
N/A	N/A	1		New Policy	

Approver	Christopher Sharp - Director
Approval Signature	
Approval Date	10/09/2025