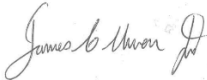


TP Niven Ltd

Corporate Policies

Effective Date	20 May 2026
Version	3
Reviewed/updated by	S Stevenson, External HR Consultant
Approved by	JC Niven, Managing Director
Approval signature	
Controlled version?	Controlled version is electronic and stored on J Drive, all other versions are uncontrolled



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2. CORPORATE SOCIAL RESPONSIBILITY

2.1. Definition

Corporate social responsibility (CSR) is a concept whereby an organisation recognises that its business operations and processes may have an impact on social, economic and environmental issues outside of the workplace. It also represents a commitment to ensuring and maintaining socially responsible behaviour in an organisation.

2.2. Purpose

We seek to sustain a business that is successful and respected in its ethical standing by our stakeholders. These include customers, clients, regulators, suppliers and the community. We embrace the role our business plays on a day to day basis in contributing to a better society.

2.3. Policy

We are aware that the running of our business will, in many ways, affect our place of work, the community and the wider environment in which we operate. We believe that the way we run our business can and should make a positive difference in these areas and we aim to ensure that continued efforts are made to achieve that.

2.4. Environment

With regard to the business' impact upon the environment, we are committed, amongst other initiatives, to:

- reducing fuel consumption and vehicle emissions through monitoring & analysis, education & training, increasing percentage of 'loaded miles', better route planning, improved vehicle design and use of technology
- efficient printing
- reducing the amount of waste produced by the business
- ensuring that water/electricity is used responsibly by our staff
- recycling materials as extensively as possible
- using technology to lessen the need for travel
- using public transport wherever possible when travelling is unavoidable.

2.5. Charitable/community work

Our organisation is keen to support and become involved in community initiatives and charitable work. We do this in the form of sponsorship, donations to national and local charities which may be suggested by our staff, and the funding of community projects. Every suggestion is given due consideration.

2.6. Education

We recognise the importance of education in our community, and supporting individuals during this process is key to advancement. We offer internal training (and external training where appropriate)

and we also offer a number of trainee and Modern Apprentice schemes. We also work with external organisations and local schools when appropriate.

2.7. Our employees

We keep our staff informed of our policies and procedures and we encourage them to share their ideas with us on both internal processes affecting them, and the way our service is provided to customers/clients. We maintain an open and honest approach to all of our communications.

We carry out a regular Driver Forum with representatives from across the business.

2.8. Equal opportunities

We are committed to providing an environment of equal opportunities for all members of our workforce. No account of any of the protected characteristics set out in the Equality Act 2010 shall be taken to a detrimental effect in any decision involving recruitment, promotion, provision of facilities etc. See our equal opportunities policy for more detail in this regard.

2.9. Business partnerships

We will strive to engage with local suppliers and businesses where possible to meet the business' operational needs, in order to support businesses within our area and decrease our carbon footprint.

In respect of our entire CSR initiative, we expect no lesser standards from our suppliers and business partners.

2.10. Ongoing commitment

We are fully committed to the principle of CSR and aim to ensure that no relevant policy decisions are made within the business, without first evaluating the potential CSR impact.

3. ETHICAL TRADING

3.1. Policy statement

TP Niven is committed to protecting workers rights, both in our own business and in our supply chains. We assess ourselves and our suppliers against the Ethical Trading Initiative ('ETI') Base Code which is an internationally recognised set of labour standards.

TP Niven will ensure that:

1. Employment is freely chosen
2. Freedom of association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practised
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed.

TP Niven is aware of the UK Modern Slavery Act 2015 that is designed to tackle slavery in the UK, and whilst we are not legally required to publish an annual modern slavery statement, we are fully committed to ensuring that slavery and human trafficking are not taking place in our business or any of our supply chain. We have a separate voluntary policy on slavery and human trafficking.

3.2. Our commitment

TP Niven will put in place any measures required to ensure that our commitment to the ETI Base Code is upheld. The following standards are taken from the ETI Base Code and are the very minimum standards that the organisation will consistently meet:

ETI 1 - Employment is freely chosen

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

ETI 2 - Freedom of association and the right to collective bargaining are respected

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

ETI 3 - Working conditions are safe and hygienic

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to clean water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

ETI 4 - Child labour shall not be used

4.1 TP Niven strictly prohibits the use of child labour in any part of our operations or supply chain. We adhere to all applicable laws and regulations governing the minimum age for employment. Please refer to our Child Labour policy for further details.

ETI 5 - Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.

5.2 All workers shall be provided with a Statement of Main Terms and Conditions of Employment by no later than day 1 of employment. Employees will receive a payslip each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by contract or national law be permitted without the express permission of the worker concerned. All disciplinary measures will be carried out in accordance with the ACAS Code of Practice on Disciplinary and Grievance Procedures and accurate documents will be maintained.

ETI 6 - Working hours are not excessive

6.1 Working hours must comply with national laws (including transport laws where applicable), collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract and written agreement.

6.3 Overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment.

6.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

ETI 7 - No discrimination is practiced

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

ETI 8 - Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or homeworking arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

ETI 9 - No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

3.3. Associated policies

Please also refer to TP Niven's Equality Policy (located in the Employee Handbook).

4. CHILD LABOUR

4.1. Introduction

TP Niven Ltd prohibits child labour however we recognise that risk remains and where found must be addressed.

4.2. Scope and Definitions

This procedure is to be enacted if a case of child labour is found within our own operations, or an operation within our supply chain. A thorough investigation should be conducted to establish the facts of the case and the child's circumstances.

TP Niven classifies a child as any person who is not over compulsory school age (see [School leaving age - GOV.UK \(www.gov.uk\)](https://www.gov.uk/school-leaving-age)).

TP Niven classifies a young person as any worker over the age of a child as defined above and under the age of 18.

4.3. Key Principles

The safety and security of the child are paramount, and the protection of the child comes first. A child should not be dismissed without a plan in place for what will happen to him or her. Any resolution or remediation action must ensure that the child is not going to suffer financial losses and should not leave a child vulnerable to abuse.

Investigations and remediation plans should be made in conjunction with the child's parents or guardian and consultation should be sought from relevant local and trusted professionals, including the local government authorities and child protection agencies.

Remediation plans for young workers who are engaged in hazardous or night work should include the offer of an alternative role, without penalty for them.

TP Niven expects suppliers to monitor their supply chains to ensure that they are not employing child labour - including young workers in hazardous conditions or night work. This should include, at a minimum, ensuring that age verification checks are being conducted and records maintained. Where child labour is found, TP Niven expects suppliers to inform us as soon as possible and to have effective remediation guidance in place in case instances of child labour are discovered. TP Niven is prepared to end relationships with suppliers who breach these requirements, particularly if they refuse to engage in the remediation process.

4.4. Remediation

Where a child worker is found in employment then they should be informed of why they should not be working and what is going to be happening with regards to their job and their income. Where a young worker is found to be working in hazardous conditions, or involved in night work, it should be explained to them why they cannot work in that role, and an alternative position should be found for the worker which meets the criteria for the employment of young workers but does not penalise them by reducing their income.

The child must be afforded appropriate protections as required by local law, to ensure their rights are upheld. Where a child worker is found and there is evidence of criminal activity or trafficking then, as the first port of call, the child should be placed into the care of the local authorities for their safety. This must be done by a trusted party so as not to alert the criminals to the process.

When planning the remediation process, consult with the child (and their family if appropriate) to understand their wishes, and where possible these should be prioritised. Work with the site, and direct supplier where relevant, to ensure that there is a plan of action in place with assigned responsibilities. Whilst any investigation is ongoing, ensure that the child is not at a financial loss; ensure that compensation is being paid for any lost earnings and that this will cover accommodation and food costs with some extra leftover.

5. MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

5.1. Introduction

TP Niven Ltd opposes slavery and human trafficking in all its forms. We are committed to ethical trading principles and to acquiring goods and services without harm to others.

5.2. About us and our supply chains

We are a family owned freight transport and logistics business with a turnover of over £36M.

We provide general haulage and specialist logistics solutions to customers throughout the UK.

Our main suppliers include petrol and diesel suppliers (including service stations), HGV dealers and mechanical parts and tyres suppliers.

We are:

- A member of the Dairy Transport Assurance Scheme (DTAS) which is affiliated with Red Tractor and Dairy UK.
- SOPA, Soil Association and FORS accredited
- A member of the 'SafeContractor' scheme

5.3. Due diligence and risk assessment

To help identify and monitor the risk of slavery and human trafficking in our supply chain we vet suppliers and sub-contractors to ensure that they are committed to ethical labour practices.

We only employ agency workers through reputable employment agencies that adhere to our Ethical Trading Policy.

Where appropriate, we seek assurances from our suppliers and contractors that they comply with applicable labour laws and operate fair and lawful employment practices. We expect our suppliers, contractors and business partners to share our commitment to ethical standards and to take appropriate steps to prevent modern slavery and human trafficking within their own businesses and supply chains.

5.4. Our policies

TP Niven Ltd operates a number of policies and procedures which support our commitment to preventing modern slavery and human trafficking in our business and supply chains. These include:

- Ethical Trading Policy
- Child Labour Policy
- Corporate Social Responsibility Policy
- Whistleblowing Policy
- Diversity, Equity and Inclusion Policy
- Health and Safety Policy

These policies help ensure that our business is conducted in an ethical and transparent manner and that workers are treated fairly and with respect.

5.5. Recruitment and employment practices

TP Niven Ltd is committed to fair recruitment and employment practices.

We ensure that all employees have the legal right to work in the UK and that appropriate right to work checks are carried out prior to employment.

We do not tolerate forced labour, bonded labour or human trafficking within our company.

We have provision for reasonable periods of notice within our employment contracts.

We aim to ensure that all workers are treated with dignity and respect and that employment terms are clear and transparent.

5.6. Training and awareness

Managers responsible for recruitment, procurement and supplier relationships are expected to remain aware of potential indicators of modern slavery and to escalate any concerns to a member of the Senior Management Team.

5.7. Reporting concerns

TP Niven Ltd encourages employees, suppliers and other stakeholders to report any concerns regarding modern slavery or unethical practices via a member of the TP Niven Senior Management Team.

Concerns can also be raised through the company's Whistleblowing Policy.

All reports will be taken seriously and investigated appropriately.

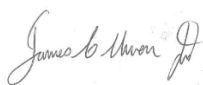
5.8. Review of this statement

This statement will be reviewed annually to ensure that it remains effective and reflects any changes in legislation, guidance or business operations.

5.9. Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes TP Niven Ltd's slavery and human trafficking statement for the financial year ending 31 March 2026. It was approved by the TP Niven Ltd board of directors on 20 May 2026.

Signature:



Name: JC Niven
Position: Managing Director
Date: 20 May 2026

6. HANDBOOK UPDATES

The following changes have been made to this version of the Additional Corporate Policies:

- Voluntary Slavery and Human Trafficking Statement removed
- Slavery and Human Trafficking Statement removed inserted

7. END