

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2022

This statement is made on behalf of TC Group Holdings Limited (Company no: 11251664) pursuant to section 54(1) of the Modern Slavery Act 2015 (the **Act**) and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2022.

This is our first statement under the Act.

OUR STRUCTURE

TC Group Holdings Limited is an intermediate parent company which holds shares directly in all of the group's trading subsidiaries (which together trade as 'TC Group'). TC Group is a group of professional service firms which is made up of separately constituted and regulated legal entities which operate in the accountancy and professional services industry. TC Group Holdings Limited was established as part of a group re-organisation in 2018; with the original business having been established in 1996.

Since 26 June 2023, Auctus Topco Limited has been the ultimate parent company of TC Group.

Further information about our structure can be found here: <https://www.tc-group.com/legal-notices/>

OUR BUSINESS AND SUPPLY CHAINS

TC Group is an Accountancy Age 'Top 30' firm of accountants and tax advisers specialising in the provision of bespoke, high-quality accountancy, business advisory and taxation solutions. Our expert knowledge and experience allow us to provide our clients with results designed to meet the unique needs of their businesses. In addition we offer our clients a whole host of other complementary services including legal, HR and financial planning services so that we can advise them throughout their business journey.

We have offices based across the UK and a company based in, and registered in, India (BOKS Business Services Private Limited)

The Group has around 700 full and part time employees in the UK, the majority of which are on permanent contracts.

Some entities within the TC Group occasionally use agency staff. We only use specified, reputable employment agencies to source agency workers and we verify the practices of any new agency that we are using before accepting workers from that agency.

A key supply chain relates to our IT provision and those suppliers are primarily based within the UK and Europe. The supplier of our expenses management system is based within the United States.

BOKS Business Services Private Limited employs approximately 70 employees and its supply chain includes organisations based in India.

OUR APPROACH

Our policy is to conduct our business in an honest and ethical manner.

We are committed to improving our practices to combat slavery and human trafficking in our business and supply chain. Given the nature of our business we have assessed the risk of

modern slavery within the Group to be low. However, we have not taken any specific steps in relation to modern slavery during the financial year to which this statement relates.

We comply with all UK employment legislation and where possible exceed requirements. Right to work documentation is checked and confirmed on a new starter's start date and all job offers are made subject to satisfactory right to work evidence being produced. All terms and conditions are shared prior to employment and policies are made available to all new staff on joining and then are available on our intranet. This includes our complaint and grievance mechanisms and whistleblowing policies, which are contained in our Employee and Subcontractor Handbook. We do not have a modern slavery policy but we are in the process of creating one for the TC Group during the financial year ending 31 December 2023.

We are not aware of any reports of potential modern slavery occurring within our group supply chain. In the event of any such reports we would provide all necessary assistance to the relevant authorities. We have not, and to the best of our knowledge no part of our supply chain has, been investigated, sanctioned or prosecuted in the UK or elsewhere in relation to any breach of applicable laws relating to human rights, including modern slavery.

TARGETS FOR THE YEAR AHEAD

We will continue to keep under review our internal processes to identify what further steps can be taken to ensure that our obligations under the Act are met and that there is no slavery or human trafficking in any part of our business.

During the financial year ending 31 December 2023 we will undertake an assessment of our current procedures. This will include:

1. consideration of what additional procedures proportionate to the risks faced by our business would be appropriate in respect of modern slavery and human trafficking; and
2. preparing a modern slavery policy for the TC Group.

We will review progress regularly and report in our next statement against the above.

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 financial year ending 31 December 2022.



The statement was approved by the Board on 11th September 2023 and signed on behalf of the Board by Grant Bartholomew, Group COO, TC Group Holdings Limited.