

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY AND STATEMENT

Approved by the Board of Trustees in October 2026.

1. Purpose and scope

- 1.1. This document sets out Tate's policy in relation to modern slavery and human trafficking, together with the steps taken to prevent such practices within its operations and supply chains.
- 1.2. Tate is a "large organisation" for the purposes of section 54 of the Modern Slavery Act 2015 'MSA 2015' and publishes this statement in accordance with its statutory obligations. Tate welcomes the opportunity to state very clearly its policy regarding modern slavery and human trafficking.
- 1.3. This policy applies to all individuals working for Tate Gallery and Tate Enterprises Limited ('Tate') in any capacity, including Trustees, Directors, employees, workers, volunteers, interns, agents, artists, contractors, suppliers, external consultants, and other third-party representatives and business partners.

2. Policy Statement

- 2.1. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as actual slavery, enforced servitude, forced and 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.
- 2.2. Tate unreservedly condemns modern slavery and human trafficking wherever in the world it occurs. Tate has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its supply chains.
- 2.3. Tate seeks to ensure there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with the disclosure obligations under the MSA 2015.
- 2.4. Tate expects the same high standards from all of its contractors, suppliers and other business partners. As part of its contracting processes and Supplier Code of Conduct, Tate includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that its suppliers will hold their own suppliers to the same high standards.
- 2.5. This policy does not form part of any employee's contract of employment and may be amended at any time. However, individuals are required to comply with this policy as part of their duties when working for or on behalf of Tate.

3. Responsibilities

Scope of application

- 3.1. The following persons must ensure that they read, understand and comply with this policy:
 - Trustees;
 - Directors of Tate Enterprises Limited and Tate Gallery;
 - Employees at all levels across Tate Gallery and Tate Enterprises Limited;
 - Casual and agency workers;
 - Seconded workers;

- Volunteers;
- Interns;
- Artists;
- Contractors and suppliers, including agents, external consultants, third-party representatives and business partners.

Universal obligation

- 3.2. The prevention, detection and reporting of modern slavery in any part of Tate's business or supply chains is the responsibility of all those working for or with Tate. Individuals are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Board accountability and governance oversight

- 3.3. Under MSA 2015, the Board of Trustees has overall responsibility for ensuring this policy complies with Tate's legal and ethical obligations, and ensuring compliance with it across Tate.
- 3.4. The Board of Trustees has delegated day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and overseeing internal controls to the Accounting Officer.
- 3.5. Tate's Ethics Committee will review any issues as they arise concerning modern slavery and/or human trafficking which may be identified within Tate's supply chains and will make recommendations to the Board of Trustees/ Directors' Group as appropriate.

Operational leadership and support

- 3.6. All Directors and Heads of Department are responsible for monitoring business relationships within their areas and for ensuring that contractors, suppliers and third parties operate in accordance with this policy.
- 3.7. The Procurement team provides advice in this regard in relation to supplier risk and compliance.

Line management

- 3.8. Managers at all levels are responsible for ensuring that individuals within their areas understand and comply with this policy and receive appropriate training on modern slavery risks. Responsibility for developing and delivering such training will be shared between the Legal, HR and Procurement teams.

4. Procedure to raise a concern

- 4.1. Individuals must notify their line manager or the Head of Procurement as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 4.2. Concerns may also be raised with the Head of Procurement or the General Counsel, or via Tate's Whistleblowing Policy.
- 4.3. If there is uncertainty as to whether a particular act, the treatment of workers more generally, or their working conditions within any tier of Tate's supply chains constitutes any of the various forms of modern slavery, individuals are required to raise the matter through these channels for further advice.

5. Whistleblowing protection (This section is to be read in conjunction with Tate's wider Whistleblowing Policy)

- 5.1. Tate aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 5.2. Tate is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be

taking place in any part of Tate's business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

- 5.3. If a member of staff believes that they have suffered any such treatment, they can use Tate's Grievance Policy to address these concerns. Contractors, suppliers and other third parties should use their own internal policies and procedures to address concerns and can also use Tate's Whistleblowing Policy to bring it to Tate's attention.

6. Communication and awareness of this policy

- 6.1. Training on this policy, and on the risks of modern slavery in Tate's operations and supply chains is provided as part of induction for all individuals working for Tate, with periodic refresher training as required.

Tate's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them. All third parties (i.e. non-employees) must be made aware of this policy and are expected to operate in accordance with its requirements at all times. Obligations relating to compliance with, and breach of, the Modern Slavery Act 2015 must be incorporated into all relevant contracts entered into by Tate with contractors, suppliers, artists and other third parties and monitored as appropriate thereafter.

7. Contracts documentation

- 7.1. All contracts between Tate and a supplier of goods or services should include provisions requiring compliance with the Modern Slavery Act 2015, such as the following:

- 7.2. "In performing its obligations under the agreement, the Supplier shall:

- comply with all applicable anti-**slavery** and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the **Modern Slavery Act 2015**;
- have and maintain throughout the term of this agreement its own policies and procedures to ensure its compliance;
- not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4 of the **Modern Slavery Act 2015** if such activity, practice or conduct were carried out in the UK;
- include in its contracts with its subcontractors and suppliers anti-slavery and human trafficking provisions that are at least as onerous as those set out in this clause."

- 7.3. Contracts with other persons who are involved in a supply of some description, such as artists providing commissioned work, should contain a provision requiring them to abide by all applicable laws, as follows:

- "In performing its obligations under this Agreement, each party shall comply with all applicable laws, statutes, regulations and codes from time to time in force including without limitation the UK GDPR and Data Protection Act 2018, the Bribery Act 2010 and the Modern Slavery Act 2015".

- 7.4. When negotiating and agreeing contracts, Tate staff are encouraged to use Tate's own precedent documents, which will contain the above clauses as relevant. Where it is appropriate for business reasons to agree to contract on the other party's own terms, then the Legal team must always be consulted and asked to review any proposed terms.

8. Breaches of this policy

- 8.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 8.2. Tate may terminate its relationship with other individuals and organisations working on its behalf if they breach this policy.

9. Steps taken during financial year 2025/2026 to deal with modern slavery risks

- 9.1. The Procurement team continued to analyse quotes and bids in greater detail where the contract being tendered involves staffing which is provided near to or at living wage. This analysis ensures that any quoted costs allow for payment of a living wage to staff who are carrying out services under a contract for Tate.
- 9.2. The Procurement team checks its active suppliers against the latest Department of Business and Trade [National Minimum Wage Naming Scheme](#) to ensure that minimum wages are being paid.
- 9.3. Where a tender exercise involves procuring in high-risk industries (labour-intensive and/or involving raw materials), with a high-risk workforce (low-skilled, unskilled, temporary/seasonal, isolated, dangerous work), an enhanced check is performed of the bidders involved, following the guidance set out in the [Cabinet Office Procurement Policy Note 009](#).