

## MODERN SLAVERY ACT 2015 STATEMENT

The Modern Slavery Act 2015 came into effect on 29<sup>th</sup> October 2015. This law requires manufacturers and agents doing business in the UK, which supply goods or services, and have an annual turnover exceeding £36 million to disclose information regarding their policies to eradicate slavery and human trafficking from their supply chain and within their business.

The Tibbetts Group, encompassing the divisions of TGL, BFC and PG source, test, supply, repackage and assemble batch traced engineered components to Automotive, Aerospace and Industrial sectors and are dedicated to product quality and customer satisfaction.

Efforts by The Tibbetts Group to eradicate slavery and human trafficking in its supply chain and own business include the following:

### Supply Chain

#### Written policies and procedure

- The Tibbetts Group maintains written policies that strictly prohibit the use of slavery or human trafficking in its direct supply chain. Our Ethical Working Practice Policy communicates our ethical principles and associated expectations to our supply chain. Our supplier code of conduct requires our suppliers to sign up to a sustainability clause which details all requirements around forced labour, slavery and human trafficking.

#### Supplier certifications

- When a supplier signs up to our sustainability clause, The Tibbetts Group interacts with them to confirm they will adhere to the guidelines and expectations that we would expect, focusing on, but not limited to, 'Child Labour Avoidance', 'Freely Chosen Employment', and 'Freedom of Association' in line with the Modern Slavery Act 2015. This agreement is mandatory, and The Tibbetts Group does not deal with suppliers who do not sign up to this clause.

#### Third party audits

- The Tibbetts Group have the right at any time to audit suppliers for compliance against the sustainability clause.

#### Violations

- The Tibbetts Group have a zero-tolerance policy towards violations of the laws banning forced labour, slavery and human trafficking. Our contractual agreements give us the right to audit suppliers at any time for compliance with the sustainability clause and permit the termination of suppliers for a single violation.

## Our own business

### Written policies and procedures

Our Anti-Slavery, Human Trafficking and Child Labour Policy and Equal Opportunity Policy details the rules and procedures by which we should treat fellow employees. This includes:

- Transparent and fair behaviour, such as protecting human rights
- Compliance with legislation, including fundamental rights at work – in particular freedom of association and elimination of discrimination throughout employment.

### Employee training

The Tibbetts Group conducts online and face-to-face training for all employees to emphasise the importance of acting with integrity and in line with our own internal Ethical Business Code.

### Human rights

The Tibbetts Group regularly undertakes a Human Rights Compliance Assessment to ensure that all areas of its business are compliant with its Ethical Business Code and international human rights standards and that all employees are treated in a fair and transparent manner. This includes adherence to the Working Time Directive and the National Minimum Wage.

### Violations

The Tibbetts Group's disciplinary policy permits the termination of employees found to be involved in any breach of the law banning forced labour, slavery and human trafficking.