TIBBETTS
ANTI-SLAVERY, HUMAN TRAFFICKING AND CHILD LABOUR POLICY

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.

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, 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.

Tibbetts is committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business, or in any of our supply chain.

We are also committed to ensuring there is transparency in our own business and to always comply with all UK laws and legislation regarding the type of work carried out, when they can work, hours of work and length of breaks of any individuals aged between 15 and 18, for example, in the event of work experience or work during educational leave periods. Our policy also includes an explicit ban on the use of any forced labour in our workforce or exploitative working conditions.

Our transparent approach extends to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Scope

The purpose of this policy is to:

- set out our responsibilities, and of those working, for and on behalf of Tibbetts, in observing and upholding our position on modern slavery, human trafficking and child labour; and
- provide information to those working, for and on behalf of Tibbetts, on how to identify and report concerns regarding modern slavery, human trafficking, and child labour.

This policy applies to all persons working for us, or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Responsibilities

The Group People & Culture Manager has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Group People & Culture Manager also has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the People & Culture Department.

Raising a Concern

You must ensure that you read, understand, and comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your Line Manager or the People & Culture department as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business, or supply chains of any supplier tier at the earliest possible stage.

If you believe, or suspect, that a breach of this policy has occurred or that it may occur, you must report it in accordance with our Whistleblowing Policy (PC32) as soon as possible. You should note that where appropriate, and with the welfare and safety of local employees as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of employees more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, we encourage you to raise it with your Line manager or the Group People & Culture Manager.

We aim 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. We are 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 our own business or in any part of our supply chain. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group People & Culture Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance procedure, which can be found in the Employee Handbook.

Training, promotion, and conditions of service

Training in this policy, and on the risk our business faces from modern slavery in its supply chain, forms part of the induction process for all individuals joining our procurement department and Management Team, and further training will be provided to those individuals as necessary.

Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Contact details

Tibbetts People & Culture Department
Group People & Culture Manager and Group People & Culture Advisor
Email: people@tibbettsgroup.com
Tel: 01295 477502

The Group People & Culture Manager will review this policy and monitor it's effectiveness on a regular basis in consultation with the Management Team.