TIBBETTS
MODERN SLAVERY ACT 2015 STATEMENT

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.

The purpose of this statement is to set out the approach of the Tibbetts Group to eliminating modern slavery, human trafficking, forced labour and labour rights violations from our business activities and supply chain.

The Modern Slavery Act 2015 came into effect on 29th 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.

Definition

Modern slavery is the severe exploitation of someone for commercial gain. It can include:

- human trafficking – where someone facilitates or arranges the transport of another person for exploitation
- forced labour – where someone is forced to work through coercion (threats)
- serfdom – where someone is forced to work through coercion and lives on another's property
- bonded labour – where someone in poverty borrows money and is forced to work to pay off the debt
- descent-based slavery – where slavery is 'passed down' through a family line
- forced and early marriage – where someone is married against their will or is too young to consent to the marriage

Preventing modern Slavery in our Supply Chain

We will ensure that modern slavery does not form part of our business operations within our Supply Chain with:

Written policies and procedure

We maintain written policies that strictly prohibit the use of slavery or human trafficking in our 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, we interact 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 we do not deal with suppliers who do not sign up to this clause.

Third party audits

We have the right at any time to audit suppliers for compliance against the sustainability clause.

Contracts with suppliers will state that:

- suppliers' performance with regards to modern slavery will be monitored alongside other parts of the contract
- suppliers are expected to monitor their own supply chains and report any breaches of the Modern Slavery Act 2015
- suppliers are not permitted to subcontract without our consent
- if an instance of modern slavery is identified and not rectified to our satisfaction, we can terminate the contract with the supplier at no penalty to us

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.

Preventing modern Slavery in our own business

Efforts by The Tibbetts Group to eradicate slavery and human trafficking in its own business with:

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.

Dealing with an instance of modern slavery

If an employee spots any instance of modern slavery, they should report it to the police immediately. If the situation is not an emergency, they can call the police on 101. If there is a risk of immediate danger, they should call 999. They should also advise a senior manager of their concerns. How to deal with a situation of this nature is detailed below:

Dealing with an instance of modern slavery in our Supply Chain

If an instance of modern slavery is found within our supply chain, employees should notify a member of the Green Management team who will decide appropriate action. This may include:

- offering advice to the supplier on steps they can take to eradicate modern slavery
- setting a deadline by which changes must be made

- terminating the contract with the supplier

Dealing with an instance of modern slavery within our organisation

If an instance of modern slavery is found within our organisation, senior leaders will be informed immediately, and a senior person appointed to oversee all measures necessary to rectify the situation. Steps needed may include:

- changing processes and policies
- providing more training to all employees
- reporting individuals who have breached the Modern Slavery Act 2015 to the appropriate authority
- where an employee has fallen short of the expectations of this policy, taking action in line with our company capability or disciplinary procedure

Dealing with an instance of modern where it is occurring outside of the UK

If modern slavery is identified outside of the UK, the appropriate response will depend on the local circumstances. For example, we may need to work with:

- non-governmental organisations (NGOs)
- local government and law enforcement
- industry bodies or trade union organisations

The immediate response should always be guided by what is safest for the employee and the potential victims.

Raising concerns

Employees are encouraged to talk to a member of the People & Culture department if they have a question about modern slavery, or if they are not sure something they have seen counts as modern slavery.

The Modern Slavery Helpline can also provide advice. Their number is 08000 121 700.

Impact on employees

An employee will face no negative consequences for:

- alerting the appropriate authority and/or senior leaders to an instance of modern slavery
- raising concerns about our business practices
- seeking advice from an outside party about modern slavery
- asking questions about modern slavery

If an employee feels they have suffered a detriment for any of the above, we encourage them to raise this using or company grievance procedure or our whistleblowing procedure.

Employee training

All employees are made aware of this statement and our approach to preventing modern slavery. We provide targeted training to employees in roles where there is a higher risk of exposure, ensuring they can recognise potential indicators of modern slavery and understand how to raise concerns.