

1 Modern Slavery Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that TVS Supply Chain Solutions Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. It reflects the changes made in the 2020 financial year which ended on 31st March 2020. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. We have a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

2 Our Business

We are a provider of outsourced supply chain management services for parts which operates across the automotive, beverage, defence and energy / utility sectors. The parts supply base profile ranges from distributors to raw material providers. Sourcing of parts is predominately from UK suppliers although the company does source parts from the Far East and Europe.

3 Our High Risk Areas

A proportion of our parts are sourced either directly or indirectly from the Far East. Our terms flow down the requirement to all suppliers with regards to slavery and include the right to audit, including without notice where there is concern or a suspected breach. Any breach would be reported to the appropriate body

4 Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These policies cover purchasing and recruitment activities, and include:

Ethical Sourcing Policy. This policy encompasses comprehensive criteria on anti-corruption, labour rights, fair and safe working conditions and environmental compliance.

General Terms and Conditions of Purchase. These terms are used with all our suppliers in the purchase of all parts and services. They flow down our policy with regards to antibribery, corruption, slavery and human trafficking.

Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Recruitment Selection Policy. This policy requires all new employees to supply work references, evidence of eligibility to work in the UK and identification documents. This also requires recruitment agencies to sign up to comply with TVS' policies.

5 Our Suppliers

We operate a supplier selection policy and maintain a preferred supplier list. The risks associated with a supplier are assessed and we conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence can include a supplier questionnaire, an online search to ensure that a particular organisation has never been convicted of offences relating to modern slavery and on site audits of suppliers identified as "at risk" which includes a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They comply with all applicable anti-slavery and human trafficking legislation
- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery
- That our UK based suppliers pay their employees at least the national minimum wage / national living wage as appropriate
- That our international suppliers pay their employees any prevailing minimum wage applicable within their country of operations

We may terminate the contract at any time should any instances of modern slavery come to light.

6 Training

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

7 Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

8 Continuous improvement

TVS continually improves our staff awareness of slavery and human trafficking and update all the related policies and procedures as our understanding of the current issues evolves.

Specific improvements carried out during the last financial year include:

- All colleagues responsible for supplier selection completed the Chartered Institute of Procurement and Supply Ethical Procurement and Supply Certification
- TVS now hold the Chartered Institute of Procurement and Supply corporate Ethics status (Certificate available on our website)

- A focused country of origin review has been carried out across moving parts, enabling identification of country profiling for supply chain risk identification
- Modern Slavery clause incorporated within the TVS Supplier Agreement PUR00023 and Terms and Conditions Purchase of Goods PUR00017- flowed down to the supply base.
- Overseas supplier audits taken place in areas considered high risk for modern slavery (Romania, India and Pakistan) and the ability to utilise 3rd party auditors where required introduced.

9 Approval for this statement

This statement was approved by the Board of Directors



Paul Roberts
 Finance Director

Issue Record

Date	Issue Level	Amendments	Author / Approval
Sept 2016	1	First Issue	Paul Roberts
Sept 17	2	Review and added to Connect	Ian Packer
July 2018	3	TVS Logo updated	Ian Packer
Aug 2018	4	Continuous Improvement paragraph amended. TVS format	Andy Cope
May 2020	5	Updated for 2020 financial year, updating improvement activities	Andy Cope