



Techtronic Industries

# Policy Against Modern Slavery and Human Trafficking

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# 1. Overview.

## 1.1 Introduction

Techtronic Industries Company Limited (“TTI” or “the Company”) recognizes that communities, economies and businesses thrive when workers’ rights are protected. Treating workers of all types (e.g., employee, contract, student, migrant, temporary and others) with dignity and respect is a fundamental component of the Company’s commitment to acting as a good corporate citizen. Specifically, we are committed to a work environment free from forced labour (or modern slavery), unlawful child labour, and the illegal movement of people for the purpose of modern slavery or sexual exploitation (“human trafficking”).

As a leading manufacturing company, we seek to ensure that TTI employees, as well as the suppliers we engage, avoid participation in or consent to any practice that constitutes modern slavery or human trafficking. To achieve this, TTI, its employees, suppliers must follow the standards set by this Policy on Modern Slavery and Human Trafficking.

## 1.2 Objective(s)

The objectives of this Policy on Modern Slavery and Human Trafficking are as follows:

- Define the standards, expectations, and requirements that TTI employees and Suppliers must follow to prevent modern slavery and human trafficking in TTI’s business operations, whether overseen directly at TTI facilities or indirectly through the operations of Suppliers TTI engages to support its business.
- Define how TTI will make efforts to avoid, detect and eradicate modern slavery and human trafficking from the Company’s or our Suppliers’ operations.

This Policy will help TTI meet international legal obligations, commitments to its customers and best practices related to prevention of modern slavery and human trafficking, including, but not limited to:

- The California Transparency in Supply Chains Act ([http://www.leginfo.ca.gov/pub/09-10/bill/sen/sb\\_0651-0700/sb\\_657\\_bill\\_20100930\\_chaptered.pdf](http://www.leginfo.ca.gov/pub/09-10/bill/sen/sb_0651-0700/sb_657_bill_20100930_chaptered.pdf))
- United Kingdom Modern Slavery Act (2015) (<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>)
- United Nations Guiding Principles on Business and Human Trafficking ([http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf))
- Australian Federal Modern Slavery Act 2018 & New South Wales Modern Slavery Act 2018 (<https://www.legislation.gov.au/Details/C2018A00153>) and (<https://www.legislation.nsw.gov.au/#/view/act/2018/30>)

## 1.3 Scope

This Policy on Modern Slavery and Human Trafficking applies to:

- TTI, all of its subsidiaries, owned in whole or in part, and all of their employees, officers, temporary employees, contingent workers (including agency workers), casual staff and independent contractors (referenced through this Policy as “employees”).
- All TTI suppliers, vendors, and other third parties engaged to provide goods or services to TTI (referenced in this Policy as “Suppliers”).

# 2. Policy Requirements and Content.

## 2.1 Expectations

TTI will not tolerate the use of forced labour, child labour or human trafficking by any employee or Supplier in the operation or support of our business or the manufacture and distribution of our products. The following specific expectations apply to all employees and Suppliers:

### 2.1.1 No TTI employees or Suppliers will:

- Participate, directly or indirectly, in any form of the trading or coerced transport of people for the purpose of exploitation
- Engage in or promote or assist in the sexual exploitation of others.
- Use forced or involuntary labour in the performance of any work
- Retain an individual identity or immigration documents and deny access by that individual to these documents.

### 2.1.2 TTI employees and Suppliers will comply with TTI's Code of Ethics and Business Conduct and TTI's Business Partner Code of Conduct and human resources policies.

## 2.2 Requirements

### 2.2.1 Awareness and Certification

The Company's prohibition on forced labour, child labour, and human trafficking is defined in the TTI Employee Code of Conduct [http://www.ttigroup.com/en/our\\_company/guiding\\_principles/code\\_of\\_ethics\\_download](http://www.ttigroup.com/en/our_company/guiding_principles/code_of_ethics_download) the TTI Business Partner Code of Conduct [http://www.ttigroup.com/en/our\\_company/guiding\\_principles/business\\_partner\\_code\\_of\\_conduct\\_en.pdf](http://www.ttigroup.com/en/our_company/guiding_principles/business_partner_code_of_conduct_en.pdf) and this Policy. Every TTI employee and Third Party is responsible for reading, understanding and certifying compliance with the Code, the aforementioned policies, as applicable, and this Policy. The certification process requires certification to the best of their knowledge that the materials they incorporate into TTI's products were generated in compliance with applicable anti-slavery and anti-human trafficking laws.

### 2.2.2 Accountability and Management

TTI managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them. TTI has established accountability standards and monitoring procedures to ensure that the requirements identified in this Policy are followed by TTI management, TTI employees, and TTI Suppliers.

### 2.2.3 Training

TTI provides key supply chain management personnel with training on modern slavery and human trafficking. On request TTI will provide suppliers a framework against which to assess their operational compliance with the anti-slavery and anti-trafficking requirements.

# 2. Policy Requirements and Content

## 2.2.4 Verification, Audits and Investigations

As a manufacturing company, TTI appreciates the risks associated with and takes the following steps to verify, evaluate and address modern slavery and human trafficking, both in our employee-run and managed operations and in our Supplier operations:

- Certification by employees to Code of Ethics and Business Conduct (including prohibitions on modern slavery and trafficking) and by Suppliers to Business Partner Code of Conduct, including request for information/changed circumstance disclosure
- Anti-Slavery/Human Trafficking provisions included in key Supplier Contracts
- Modern Slavery and Human Trafficking Risk Assessment;
- Site visits/audits for high risk operations/Suppliers
- Required corrective action plan for non-conformities uncovered;

All TTI employees, suppliers and third parties through whom TTI conducts business are required to fully and promptly cooperate with TTI's internal and external auditors and investigators, and must respond fully and truthfully to their questions, requests for information, and documents.

## 3. Violation Reporting.

Any TTI employee or TTI Supplier, or other entity or individual providing goods or services to or on behalf of TTI has knowledge or information regarding conduct report the information to the TTI Legal and Compliance Department. We operate under a NO RETALIATION policy. This means that you will not be retaliated against for making a communication to us. We will use our best efforts to protect your privacy and keep your communication confidential where allowed by law.

We have several ways for you to contact us, please refer to our Complaint Resolution Policy and Procedure.  
<https://www.ttigroup.com/our-company/about-tti/our-policies/complaint-resolution-policy-and-procedure/>

## 4. Consequences of Non-Compliance.

- 4.1 Any TTI employee failure to cooperate with an audit or investigation related to this Policy, including, for example, hiding, deleting or destroying information or documentation, limiting investigator access to employees, or providing false information, may be grounds for disciplinary action, up to and including dismissal, subject to applicable law
- 4.2 Any TTI employee failure to comply with this Policy qualifies as a breach of the employment agreement. TTI may take disciplinary action against the employee in question, up to and including dismissal.
- 4.3 Employees or Suppliers who fail to report actual or suspected violations of this Policy may be deemed in violation of this Policy as permitted by applicable law.
- 4.4 Compliance with this Policy is a mandatory condition of doing business with TTI. TTI will terminate its agreement with any Third Party engaged in modern slavery or human trafficking.
- 4.5 Violators may also be subject to separate civil and criminal penalties.

# 5. Red Flags and indicators of worker faced, human trafficking and modern slavery.

The following is a list of potential red flags and indicators of worker forced labour and human trafficking designed to assist employees when observing TTI or Supplier operations:

## **Work and Living Conditions:**

- Not free to leave or come and go as he/she wishes
- Is unpaid, paid very little, or paid only through tips
- Works excessively long and/or unusual hours
- Is not allowed breaks or suffer under unusual restrictions at work
- Owes a large debt and appears unable to pay it off
- Was recruited through false promises related to work
- High security measures are in place where none should be required (e.g., opaque or boarded up windows, bars on windows, barbed wire, etc.)
- Working hour data does not match worker accountings

## **Poor Health or Abnormal Worker Behaviour:**

- Appear fearful, anxious, depressed, submissive, tense or paranoid
- Exhibits unusual behaviour if topic of law enforcement is raised
- Avoids eye contact, even when requested
- Lacks medical care and/or has been denied medical services by employer
- Appears malnourished or shows signs of exposure to harmful chemicals
- Shows signs of physical and/or sexual abuse, restraint, confinement, or torture
- No sense of time – cannot identify what day it is

## **Lack of Control:**

- Has few or no personal possessions or all possessions appear to be in workplace
- Is not in control of his/her own money, no financial records, or bank account
- Is not in control of his/her own identification documents (ID or passport)
- Not permitted to speak for himself/herself (third party insists on being present to translate)
- Claims he/she is just visiting and cannot clarify residential address
- Lack of knowledge of where he/she is

