



## **Modern Slavery Statement for Financial Year 2016/17**

This statement is made pursuant to s.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. 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.

### **Our Business**

We are a provider of outsourced supply chain management services for parts which operates across the automotive, beverage, defence and energy 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.

### **Our High Risk Area**

1. A proportion of our parts are sourced either directly or indirectly from the Far East. Our terms flow down the requirement to all Far Eastern 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

### **Our policies**

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

1. Ethical Sourcing Policy. This policy encompasses comprehensive criteria on anti-corruption, labour rights, fair and safe working conditions and environmental compliance.
  2. 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 anti-bribery, corruption, slavery and human trafficking.
  3. 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.
  4. 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.
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## Supply Chain Solutions

5. 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.

### Our Suppliers

We operate a supplier selection policy and maintain a preferred supplier list. 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 particular organisation has never been convicted of offences relating to modern slavery and on site audits of suppliers identified as “at risk” which will include 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:

1. They comply with all applicable anti-slavery and human trafficking legislation
2. They have taken steps to eradicate modern slavery within their business
3. They hold their own suppliers to account over modern slavery
4. That our UK based suppliers pay their employees at least the national minimum wage / national living wage as appropriate
5. That our international suppliers pay their employees any prevailing minimum wage applicable within their country of operations
6. We may terminate the contract at any time should any instances of modern slavery come to light.

### 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.

### 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.





## **Supply Chain Solutions**

### **Continuous improvement**

Throughout the next financial year we will continue to improve our staff's awareness of our commitment against slavery and human trafficking and in particular :

- Introduce a specific Anti-slavery policy
- Update the Employee handbook to refer to the Modern Slavery Act
- Refresher staff training on awareness of our policies

### **Approval for this statement**

This statement was approved by the Board of Directors on 30 September 2016.

A handwritten signature in black ink, appearing to read 'Paul Roberts', with a long horizontal stroke extending to the right.

Paul Roberts  
Finance Director