



# ***Modern Slavery Statement***

Version: V2.0

Owner: A Turner – Head of Compliance

Review Date: 02.07.2026

Next Review: 01.04.2027

***BELIEVE IN THE  
POWER OF US***

## Our Organisation

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TVS Supply Chain Solutions Ltd is a UK-based supply chain and procurement services organisation operating across Automotive, Beverage, Defence, Energy, Utilities and Rail sectors. We employ approximately 2000 employees across our UK locations and European Locations and manage supplier relationships globally. Our operations involve sourcing products and services from a diverse international supply chain.

## Modern Slavery Statement

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TVS Supply Chain Solutions is committed to upholding humanitarian values and continuously improving our systems to mitigate the risks of modern slavery and human trafficking. This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and outlines the steps taken by our UK divisions during the financial year 1 April 2024 to 31 March 2025 to prevent such practices within our business and supply chain.

We provide outsourced supply chain management services for components across wide range sectors including:

- Automotive
- Beverage
- Defence
- Energy and Utilities

Our supply base includes a diverse range of distributors and raw material providers.

## Our High – Risk Areas

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Modern slavery risks may be elevated in certain sectors, geographies and labour-intensive supply chains. TVS adopts a risk-based approach to identifying and managing these risks through supplier due diligence, ESG assessments, contractual controls and ongoing monitoring

Our terms flow down the requirement to all supplies with regard to slavery and include the rights to audit, including without notice, where there is a concern or a suspected breach. Any breach would be reported to the appropriate body.

## Risk Assessment

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Modern slavery risk assessments consider:

- Country risk
- Sector risk
- Product and commodity risk
- Labour intensity
- Dependency on temporary labour
- Previous supplier performance
- ESG assessment outcomes

Suppliers identified as higher risk may be subject to enhanced due diligence, corrective action plans or on-site verification activities.

## Our Policies

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TVS Supply Chain Solutions maintains a comprehensive set of internal policies designed to uphold ethical standards, promote transparency, and ensure compliance with anti-slavery and human trafficking legislation. These policies govern key operational areas including procurement, recruitment, and employee conduct, and are reviewed regularly to ensure they remain effective and aligned with evolving best practices.

### **Ethical Sourcing Policy**

Our Ethical Sourcing Policy outlines clear expectations for suppliers regarding anti-corruption, labour rights, safe working conditions, and environmental compliance. It explicitly prohibits the use of forced, bonded, or involuntary labour and requires suppliers to uphold human rights throughout their operations and supply chains.

### **General Terms and Conditions of Purchase**

All suppliers engaged by TVS are subject to our General Terms and Conditions of Purchase, which include binding clauses on anti-bribery, anti-corruption, and compliance with laws relating to modern slavery and human trafficking. These terms empower us to take remedial action, including contract termination, where breaches are identified.

### **Whistleblowing Policy**

We operate a robust Whistleblowing Policy that enables employees, contractors, and other stakeholders to report concerns about unethical behaviour—including suspected modern slavery—without fear of retaliation. Reports can be made confidentially and are investigated promptly and thoroughly.

### **Code of Business Conduct**

Our Code of Business Conduct sets out the ethical standards expected of all employees and suppliers. It reinforces our zero-tolerance approach to modern slavery and promotes integrity, respect, and accountability in all business dealings.

### **Recruitment and Selection Policy**

Due to the nature of the sectors in which we operate, our Recruitment and Selection Policy includes stringent pre-employment checks to verify candidates' identity, nationality, right to work in the UK, employment history, and—where applicable—criminal and financial background. These measures help safeguard against exploitation and ensure individuals are not subjected to coercion or trafficking.

For temporary assignments, we require recruitment agencies to conduct equivalent checks and provide contractual assurances of compliance. If a temporary worker transitions to permanent employment with TVS, we independently verify the same information to maintain consistency and due diligence.

## Due Diligence Process

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Our supplier onboarding process includes:

- Supplier screening and approval
- Review of Modern Slavery commitments
- ESG assessment completion
- Verification of business legitimacy
- Acceptance of our Supplier Charter
- Assessment of compliance policies and controls

Where concerns are identified, suppliers are required to implement corrective actions within agreed timescales.

## Governance

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Responsibility for modern slavery compliance rests with the Board of Directors, supported by the Senior VP Finance, Head of Compliance, Procurement Leadership Team and Human Resources function.

Modern slavery risks are reviewed through the Compliance and ESG governance framework, with significant issues escalated to senior leadership and the Board.

## Our Suppliers

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We work with suppliers globally and expect them to uphold ethical standards consistent with our own. To ensure this:

- We operate a supplier selection policy.
- We maintain a preferred supplier list.
- We issue a statement requesting supplier commitment to anti-slavery laws and our Equality Policy.

## Remediation

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Should evidence of modern slavery be identified, TVS will:

1. Protect potentially affected individuals.
2. Investigate concerns promptly.
3. Engage with suppliers to implement corrective actions.
4. Escalate serious concerns to relevant authorities where appropriate.
5. Review the commercial relationship.
6. Terminate relationships where remediation is unsuccessful or violations are severe.

## Our Performance Indicators

We evaluate the effectiveness of our efforts to prevent modern slavery and human trafficking through a combination of proactive and reactive measures.

These include:

| KPI                               | 2025 Baseline     | 2026 Target       |
|-----------------------------------|-------------------|-------------------|
| Suppliers assessed for ESG risk   | 75%               | 80%               |
| High-risk suppliers reviewed      | 100%              | 100%              |
| Employees completing training     | 95%               | 95%               |
| Managers completing training      | 100%              | 100%              |
| Modern slavery concerns raised    | Reported annually | Reported annually |
| Corrective action plans completed | 100%              | 100%              |

While no reports of modern slavery were received during the financial year 2025/2026, we recognise that the absence of reports does not guarantee the absence of risk. We remain committed to fostering a culture of transparency and vigilance, encouraging all stakeholders to speak up and report any concerns through clearly signposted channels and the introduction of some training modules tracked through e learning.

## Assessing Effectiveness

We review the effectiveness of our modern slavery controls through:

- Internal audits
- Supplier assessments
- Training completion rates
- Corrective action tracking
- Whistleblowing reports
- Management review processes

## Modern Slavery Commitments 2023-2026

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**ESG Supplier Assessment Process** - As part of our ongoing commitment to supply chain sustainability, TVS Supply Chain Solutions have implemented an ESG Supplier Assessment Process, with questions derived from the Government Social Value model into our operations. This assessment focuses on the five key themes and policy outcomes, including tackling economic inequality, climate action, equal opportunities, and wellbeing, and enables us to evaluate our suppliers' current environmental performance. Modern slavery is a subset within these categories.

By rolling out this questionnaire, we aim to assess and enhance the sustainability practices within our supply chain collaboratively. Through transparent dialogue and collaboration, we will work closely with our suppliers to identify areas for improvement and implement strategies to mitigate environmental impact. This proactive approach not only ensures alignment with our environmental sustainability goals but also fosters a culture of continuous improvement and responsible resource management throughout our supply chain. To date this process has been implemented across our Defence and Rail sectors, with actions implemented with those suppliers who have instigated red flags.

**Sustainability Policy** – Introduced in April 2025, this policy recognises that to embed social, environmental, and economic responsibility into our operations and supply chain is essential for future proofing business growth and long-term value. Furthermore, this keystone policy underpins a cultural shift towards acknowledging the impact of our activities on people and the physical environment and outlines commitment to recognising and implementing the process of human rights due diligence, as well as following the UN Guiding Principles.

**Procurement Sustainability Charter** – This is now being issued to our suppliers which includes our Equality Policy and requests our supplier's commitment to comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes.

**CIPS Ethical Training** – Continued participation and accreditation for all members of the Procurement Team, maintaining our CIPS Corporate Code of Ethics. This covers 59 members of staff from Placement Year Undergraduate through to the Procurement Director, promoting the importance of ethical procurement.

### Enhanced Candidate Screening

Given the nature of the sectors in which we and our clients operate, we have expanded our candidate screening protocols. Baseline Personnel Security Standard (BPSS) checks are now being rolled out for all current and prospective employees working in sensitive or high-risk environments. This measure helps safeguard against exploitation and reinforces our commitment to ethical employment practices.

**Raising Awareness** - The mechanisms of raising any concerns regarding slavery and/or trafficking will be included and signposted on our company intranet. Moreover, TVS commit to every new starter receiving Modern Slavery training during the new starter induction and onboarding processes.

**ESG Supplier Assessment Process** – We will strive to increase the volume of risk assessments being conducted with a target of 80% of our supply chain being assessed.

**Modern Slavery Awareness Training** – We will continue to review how we raise awareness of modern slavery and/or trafficking across our UK divisions. We have invested in a new e learning platform with a specific module on modern slavery which will be rolled out in the organisation Furthermore, the business will commit to ensuring all People Managers within the organisation receive Modern Slavery training during FY 25/26.

## Continuous Improvement 2026/27

A number of commitments have been identified for 2026/2027 for TVS to improve its modern slavery monitoring and assessment including

| Area                                 | Action                                                                                                                                                       | Target                                                                                   |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| Supply Chain Mapping                 | Map Tier 1 suppliers and identify critical Tier 2 suppliers to improve visibility of modern slavery risks beyond direct suppliers.                           | 100% Tier 1 supplier visibility and mapping of Top 20 strategic suppliers beyond Tier 1. |
| Modern Slavery Risk Register         | Establish a dedicated Modern Slavery Risk Register incorporating geographical, sector, labour and supplier-specific risks.                                   | Quarterly review by Compliance and annual review by the Board.                           |
| Supplier Risk Segmentation           | Implement a formal supplier risk-scoring methodology based on country of origin, commodity type, labour intensity, ESG performance and business criticality. | 100% of active suppliers assigned a modern slavery risk rating.                          |
| Supplier Due Diligence Questionnaire | Introduce an annual Modern Slavery and Human Rights questionnaire covering recruitment practices, worker welfare, subcontracting and grievance mechanisms.   | 100% of high-risk suppliers assessed annually.                                           |
| Supplier Audits                      | Conduct enhanced reviews and audits of higher-risk suppliers where concerns or red flags are identified.                                                     | Minimum of 10 high-risk supplier reviews completed during FY 2026/27.                    |
| Training & Awareness                 | Expand Modern Slavery training to Procurement, HR, Operations, Contract Management and all People Managers.                                                  | 95% completion rate across targeted employee groups.                                     |
| Supplier Code of Conduct             | Require strategic suppliers to annually reconfirm compliance with TVS ethical sourcing and modern slavery requirements.                                      | Top 100 suppliers to re-sign commitment annually.                                        |
| Worker Voice & Grievance Mechanisms  | Pilot worker feedback and grievance mechanisms with selected higher-risk suppliers to strengthen visibility of labour conditions.                            | Pilot programme implemented with at least 5 high-risk suppliers.                         |
| Internal Assurance                   | Include modern slavery controls and supplier due diligence processes within the internal audit programme.                                                    | Minimum of 2 internal audits completed annually.                                         |

|                                           |                                                                                                                                                     |                                                                                     |
|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| <b>Governance &amp; Reporting</b>         | Develop a quarterly Modern Slavery dashboard covering risk assessments, training performance, supplier reviews and corrective actions.              | Quarterly reporting to Senior Leadership Team and annual Board review.              |
| <b>Corrective Action Management</b>       | Implement formal tracking of supplier corrective actions arising from assessments or audits.                                                        | 100% of corrective actions assigned, monitored and closed within agreed timescales. |
| <b>ESG Assessment Programme</b>           | Continue expansion of ESG supplier assessments across all UK business sectors.                                                                      | 90% of annual supplier spend covered by ESG assessments.                            |
| <b>Benchmarking &amp; Best Practice</b>   | Benchmark TVS's approach against CIPS, UN Guiding Principles and customer expectations within Defence, Rail and Automotive sectors.                 | Annual maturity assessment and improvement plan produced.                           |
| <b>Recruitment &amp; Labour Standards</b> | Review recruitment practices, agency labour controls and right-to-work verification arrangements.                                                   | Zero non-compliance findings and annual compliance review completed.                |
| <b>Policy Review</b>                      | Review Modern Slavery Statement, Ethical Sourcing Policy and Supplier Charter to reflect legal, regulatory and industry best practice developments. | Annual review completed and approved by the Board.                                  |

## Change Log

The document will be reviewed at least every 12 months.

| Version | Action                                                                                | By                            | Date       |
|---------|---------------------------------------------------------------------------------------|-------------------------------|------------|
| V1.0    | Reviewed version, removed older version and updated legal requirements                | A Turner – Head of Compliance | 02.07.2026 |
| V2.0    | New Version created after review and legal review including section 54 reporting 2026 | A Turner – Head of Compliance | 02.07.2026 |

## Approval For This Statement

This statement was approved by the Board of Directors - **Paul Roberts – Finance Director**

