

## Modern Slavery policy statement of TFC Europe Ltd

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that TFC Europe Ltd 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. TFC Europe Ltd has 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

TFC Europe Ltd is one of the leading fastener suppliers in Europe supplying over 3,000 customers, employing over 100 people, working out of a national and European network of logistic service centres as well as being able to support global customers in their manufacturing plants anywhere in the world.

TFC Europe Ltd has a total annual turnover under the £36 million threshold for the year 2016/2017 required by the Act however does takes steps to ensure compliance is achieved and will review this figure annually.

TFC Europe Ltd operates maintains an approved supplier list of over 1000 suppliers worldwide. We conduct due diligence on all suppliers before allowing them to become an approved supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery.

### 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. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Child labour policy. This policy has been established in order to make TFC Europe's position clear to suppliers and their co-workers.
3. Ethical Policy – Provides a framework and guidance on the companies approach to achieving and maintaining good business behaviour.
4. Equality policy. We operate a robust equality 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.
5. 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.

### Training

We 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.

The Directors will ensure that this policy is communicated, understood, implemented and maintained at all levels in the organisation.

The Directors of TFC Europe Ltd are fully committed to comply with the requirements and continually improve the effectiveness of the Quality Management System.

Signed :-



Name :- Keith Kentish

Title:- Group Commercial Director

Date :- 11 December 2018