

# Modern slavery and human trafficking statement for financial year ending 31<sup>st</sup> December 2016

# Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Takeuchi Mfg UK Ltd (the "Company") 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, which includes slavery, servitude, forced and compulsory labour and human trafficking, is a crime and a violation of fundamental human rights. The Company 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 ensuring that effective systems are in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

# **Our Company and business**

The Company operates its construction machinery sales business as a wholly owned subsidiary of the Head Office, Takeuchi Mfg Co., Ltd, in Japan. We import new construction machinery from the Head Office in Japan and supply them to customers in UK and Eire through 19 dealers. We also provide Servicing and Parts provision through the dealers.

# **Our principles**

It is the Company's policy that management and employees must comply with all UK laws, regulations and the highest standards of business and ethical conduct in all dealings with customers, suppliers, government official and community.

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

- Anti-slavery Policy currently producing This policy sets out the Company's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- 1. Recruitment Procedure

Under this procedure, the Company must conduct applicants' check, such as eligibility to work in the UK for all employees to safeguard against human trafficking or individuals being forced to work against their will.

1. Whistleblowing Policy

The Company has a reporting procedure in place and operates a whistleblowing policy so that all employees know that they can report concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

# **Our supply chains**

The Company operates as a subsidiary under the Head Office in Japan. Our supply chains include:

• Excavator supplies through Head Office in Japan



- Attachment supplies
- Parts and consumables for maintenance and repair
- Logistic and delivery services for the products and parts
- Sales literature and marketing goods supplies including merchandise goods
- Office management and its maintenance supplies
- Human resources

# Due diligence process for slavery and human trafficking

The Company maintains a preferred supplier list and conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes a questionnaire and assessment with online research to ensure that particular organisation has never been convicted of offenses relating to modern slavery. We have in place systems to:

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- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle-blowers.

# Supplier adherence to our values

The Company has zero tolerance to slavery and human trafficking. We expect all customers and those in our supply chain to comply with our values.

The Company is currently in the process of sending our Modern Slavery Statement & Policy to all of our preferred suppliers.

The Company is also updating our standard terms of sale and considering our standard terms of purchase, so where such terms have been incorporated into the related contract and depending on the circumstances, we will have the ability to take appropriate contractual action (such as terminating or suspending the business) where we have a reasonable belief that modern slavery is occurring in the business or supply chain of the particular supplier.

# Training

To ensure a high level of understand of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. We will also require our business partners to provide training to their staff and suppliers.

# Actions to report Modern Slavery or Human Trafficking

Our whistleblowing policy is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The whistleblowing policy applies to all employees and may be found in clause 5 of the Company Policy of Compliance.

In Summary, the employee should approach the Manager or Human Resources. If the matter is extremely serious, then a director of the Company should be approached. The nature of the complaint will be determine the Company's next cause of action.



# Approval for this statement

This statement was approved by the Board of Directors on Takeuchi Mfg UK Ltd

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Signature: Name: Tomonori Tamaru Position: Managing Director Date: 14 September 2017