



# Modern Slavery and Human Trafficking Policy

## APPROVALS

The signatures below certify that this policy has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements retained herein and are committed to ensuring their provision.

## AUTHORISATION

This policy will be kept under review and formally revised at intervals not normally exceeding 12 months.

	Name	Signature	Position	Date
Prepared by			HSEQ Manager	21.10.2024
Reviewed by			Chairman	21.10.2024
Approved by			Chairman	21.10.2024

## STATEMENT OF INTENT

**TW Engineering Co. Ltd** is committed to preventing modern slavery, human trafficking, and any form of exploitation within our business operations and supply chains. As a UK-based supplier of hand tools, power tools, and associated equipment, we recognise the importance of ensuring that modern slavery, in all its forms, does not exist in any part of our business or supply chain. This policy outlines the steps we take to ensure ethical practices in all our operations, from sourcing materials to delivering products to our customers.

## PURPOSE

This policy sets clear expectations for our employees, suppliers, contractors, and business partners regarding modern slavery. It outlines our approach to identifying, addressing, and preventing modern slavery risks in our operations and supply chain, and ensures that we adhere to all relevant national and international laws governing human rights and labour standards.

## SCOPE

This policy applies to:

- All employees, officers, and directors of **TW Engineering Co. Ltd**.
- Our suppliers, subcontractors, and partners.
- Third-party contractors engaged in the manufacturing, transportation, or provision of services for **TW Engineering Co. Ltd**.



# Modern Slavery and Human Trafficking Policy

---

## DEFINITION OF MODERN SLAVERY

For the purpose of this policy, modern slavery refers to the exploitation of individuals through coercion, force, or deceit to work in conditions where their freedom is restricted. This includes:

- Slavery
- Servitude
- Forced or compulsory labour
- Human trafficking

## TW ENGINEERING CO. LTD'S COMMITMENT TO PREVENTING MODERN SLAVERY

We are committed to:

- **Adherence to Laws:** Complying with all applicable local and national laws relating to modern slavery, human trafficking, and human rights. This includes compliance with the UK Modern Slavery Act 2015, international conventions, and industry standards.
- **Identifying Risks:** Regularly assessing and reviewing our supply chains and operations to identify any risks related to modern slavery.
- **Zero Tolerance:** Enforcing a zero-tolerance approach to modern slavery, human trafficking, and exploitation in all aspects of our business operations.
- **Supplier Code of Conduct:** Ensuring that all suppliers, contractors, and business partners adhere to our Supplier Code of Conduct, which explicitly prohibits any form of modern slavery and exploitation.
- **Due Diligence:** Conducting rigorous due diligence to assess the ethical standards and practices of our suppliers and business partners.
- **Transparency:** Maintaining transparency and openness about our supply chains and the steps we take to combat modern slavery.
- **Training and Awareness:** Providing training for our employees to recognise the signs of modern slavery and human trafficking, and how to report concerns.
- **Freedom of Employment:** Upholding the right of all workers to freely terminate employment, without fear of retaliation or coercion.
- **Freedom of Movement:** Ensuring that all workers have the freedom of movement within the workplace, including the right to leave the workplace freely during non-working hours.
- **Freedom of Association:** Protecting the right of workers to freely associate, join trade unions, and engage in collective bargaining, without fear of discrimination or reprisal.
- **Worker Dignity:** Prohibiting any threats of violence, harassment, intimidation, or abuse toward workers.
- **Fair Recruitment:** Prohibiting the use of recruitment fees being charged to workers and ensuring that recruitment is fair and transparent.
- **Prohibition of Forced Overtime:** Ensuring that workers are not subjected to compulsory overtime and have a reasonable work-life balance.
- **Child Labour:** Prohibiting the employment of children or any form of child labour in any part of our business or supply chain.



# Modern Slavery and Human Trafficking Policy

---

- **Non-Discrimination:** Ensuring that workers are not discriminated against based on race, gender, age, religion, disability, or any other protected characteristic.
- **Protection of Identity:** Prohibiting the confiscation of workers' identification documents or any other personal belongings that could restrict their freedom.
- **Access to Remedy:** Ensuring that workers have access to remedy in case of any violations of their rights, including appropriate grievance mechanisms and support services.

## DUE DILIGENCE AND RISK ASSESSMENT

As part of our commitment to combat modern slavery, we:

- Conduct thorough due diligence when selecting suppliers, manufacturers, and business partners.
- Evaluate potential risks within our supply chains, especially in regions identified as being at an increased risk of Modern Slavery.
- Require suppliers to provide evidence of their compliance with anti-slavery laws and their commitment to ethical practices.
- Review supplier practices regularly to ensure compliance with this policy.
- Assess the risks of child labour, forced labour, and human trafficking, particularly in industries and regions with high risks.

## SUPPLIER EXPECTATIONS

We expect all suppliers and business partners to:

- Adhere to the principles set out in our Supplier Code of Conduct, which prohibits modern slavery, human trafficking, and other forms of forced or compulsory labour.
- Implement their own policies and procedures to prevent modern slavery within their operations and supply chains.
- Provide evidence of their compliance with anti-slavery, human rights, and labour laws.
- Cooperate with our due diligence process and provide information as requested during audits or investigations.
- Ensure that all workers have the freedom to terminate employment, freedom of movement, and freedom of association.
- Ensure that no workers are subjected to compulsory overtime, child labour, discrimination, or any form of forced recruitment.
- Protect workers' personal documents and ensure that no coercive or exploitative practices occur.

## REPORTING AND WHISTLEBLOWING

We encourage all employees, suppliers, and partners to report any concerns or suspicions of modern slavery or human trafficking within our business or supply chain. Reports can be made confidentially via our whistleblowing procedure. We ensure that no individual will face retaliation for reporting concerns in good faith. All reports will be investigated, and appropriate action will be taken.



# Modern Slavery and Human Trafficking Policy

---

## TRAINING AND AWARENESS

**TW Engineering Co. Ltd** will provide training on modern slavery for:

- Employees, particularly those in procurement, supply chain management, and HR functions, to ensure they are aware of the risks and signs of modern slavery.
- Contractors and suppliers to ensure they understand our expectations regarding modern slavery, worker rights, and human trafficking.
- Workers in our supply chain to ensure they understand their rights, including the right to terminate employment freely, the right to movement, and the right to join associations without fear.

## ENFORCEMENT AND CONSEQUENCES

Failure to comply with this policy, whether by employees, suppliers, or contractors, will result in appropriate actions, including the termination of business relationships where necessary. We will take appropriate legal or remedial action if we discover any instances of modern slavery, exploitation, or violations of workers' rights.

## REVIEW AND MONITORING

**TW Engineering Co. Ltd** will regularly review this policy to ensure its effectiveness. We will also monitor the effectiveness of actions taken to address modern slavery risks and make improvements where necessary. This policy will be updated as required to reflect changes in laws and best practices.