

## **MODERN SLAVERY ACT TRANSPARENCY STATEMENT**

Techtronic Industries (UK) Company Limited (TTI) recognises that communities, economies, and businesses thrive when workers' rights are protected and, as such, understands the risk of, and damage caused by, modern slavery to TTI's business.

Treating workers of all types - employee, contractor, student, migrant, temporary worker, and others - with dignity and respect is a fundamental component of TTI's commitment to acting as a good corporate citizen. Specifically, TTI is committed to a work environment free from forced labour or slavery, unlawful child labour, and the illegal movement of people for the purpose of slavery or human trafficking. TTI takes various actions to prevent the risks of modern slavery in its own operations and in its supply chains.

### **ABOUT US**

TTI is part of Techtronic Industries Company Limited (**Techtronic Industries**) a global organisation, a leader in consumer and professional products marketed to the home improvement and construction industries. Founded in 1985 and listed on the Stock Exchange of Hong Kong (SEHK) in 1990, Techtronic Industries is included in the Hang Seng Index as one of their fifty constituent stocks.

TTI is a wholesale enterprise which receives its finished goods from our global supply chain. TTI is responsible for the sales, marketing, and distribution of power tools, hand tools, accessories and floorcare products.

### **OUR OPERATIONS AND SUPPLY CHAIN**

Techtronic Industries operation around the world include manufacturing, R & D facilities as well as sales, marketing, and operations offices across North America, EMEA, Australia and New Zealand, Asia, and South America.

TTI sources all of its products from factories owned by the group. Techtronic Industries has its own factories in China, Vietnam, Germany, Czech Republic, USA and Mexico.

### **MODERN SLAVERY – RISKS FOR TTI**

During this reporting period, TTI endeavoured to align its strategic priorities towards an ethical supply chain to its Corporate Social Responsibility frameworks and commenced a continuous improvement exercise focusing on a comprehensive risk assessment.

TTI acknowledges that whilst the risk of modern slavery within our UK employee-base is very low, that our overseas supply chains have a greater risk for modern slavery practices. When considering these risks, TTI also recognises that certain aspects of our supply chains may be exposed to heightened risks of modern slavery due to outsourcing, labour hire and country of sourcing.

TTI is genuinely committed to identifying modern slavery risks and practices in our operations and supply chains, as evidenced through our risk assessment and due diligence, robust policies, procedures, and training for our employees and suppliers and partnerships.

## **PARTNERSHIPS**

TTI remains committed to collaborating and implementing meaningful and robust actions to reduce risks and practices of modern slavery within our operations and supply chains. TTI expanded partnerships with non-governmental organisations and Coalitions such as the Responsible Business Alliance, the Responsible Labour Initiative and the Responsible Mineral initiative: <https://www.responsiblebusiness.org/>. We also became a founding member of the Better Mining Initiative with RCS group and other organisations: <https://www.rcsglobal.com/bettermining/>. More information on this initiative can be found in our ESG report. Finally we became a member of the Mekong Club, a non-governmental organisation whose mission is to end modern slavery: <https://themekongclub.org/>

## **DUE DILIGENCE**

TTI performs due diligence when considering, and qualifying, new suppliers and regularly reviews and audits its suppliers. The due diligence focuses on social and environmental requirements, ethical sourcing and modern slavery and human trafficking to ensure protection of internationally proclaimed human rights.

Our Policy Against Modern Slavery and Human Trafficking outlines the various steps taken by TTI to verify, investigate, audit and remedy as follows:

- Trainings of employees on Code of Conduct and other relevant policies;
- Training and acknowledgement on the Business Partner Code of Conduct and other policies for and by suppliers;
- Human trafficking and modern slavery provisions included in key supplier contracts;
- Acknowledgment and trainings on Policy Against Modern Slavery and Human Trafficking by our employees and suppliers;
- Declarations to be filled in for sourcing of Conflict Minerals and cobalt;
- Modern Slavery and Human Trafficking questionnaire to be completed by suppliers;
- Risk assessment, site visits and audits of suppliers.
- Required corrective action plan for any discovered non-conformities.
- Zero Tolerance for Modern Slavery

## RELEVANT POLICIES

TTI has developed and implemented policies and practices that describe its approach to human rights and, in particular, to the prevention of modern slavery and human trafficking in its operations and supply chain. These policies are published on our parent company's website: <https://www.ttigroup.com/our-company/about-tti/our-policies/>

- Complaint Resolution Policy:** The organisation encourages its employees and Business partners to report any concerns. We have an independent third party to receive and process these reports on an anonymous basis.

- Employee Code of Ethics & Business Conduct:** The code makes it clear to employees what are the actions and ethical behaviour expected.

- Business Partner Code of Conduct:** The code sets out TTI requirements and expectations and requests all suppliers to acknowledge the code.

- Conflict Minerals Policy:** This policy sets up the rules, standards and expectations that TTI and its suppliers must abide by to ensure that TTI and its suppliers must source four materials – Tin, Tungsten, Tantalum, and Gold (“3TG”) from reputable sources free from conflict or other human rights violations.

- Policy Against Modern Slavery and Human Trafficking:** This policy sets further expectations in relation to human rights and modern slavery and provides a list of potential red flags as guidance to assist employees in identifying and rectifying the issues at early stage.

- Cobalt Procurement Policy:** This policy sets up the rules, standards and expectations that TTI and its suppliers must abide by to ensure that TTI and its suppliers must source cobalt from reputable sources free from human rights violations.

## TRAINING

TTI requires all employees to complete the training on our Code of Ethics and business conduct which covers human rights, ethical trade and Policy Against Modern Slavery and Human Trafficking. Our supply chain and human resources employees will be trained to identify all red flags to prevent modern slavery in the supply chain.

## AWARENESS

The Policy Against Modern Slavery and Human Trafficking has been communicated to all our employees.

Techtronic Industries produces annual reporting on all governance, environmental, social, community and supply chain management goals and initiatives which take into account legal compliance to global modern slavery frameworks. Our latest report can be located here <https://www.ttigroup.com/sustainability/esg-reports/>

**Board Approval**

This statement has been approved by the board of Techtronic Industries (UK) Limited on 20 June 2022.

This statement has been published in accordance with the Modern Slavery Act 2015.



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