

# **MODERN SLAVERY ACT 2015**

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#### **Termate - Position Statement**

The Transparency in Supply Chains provision in the Modern Slavery Act 2015 seeks to address the role of businesses in preventing modern slavery from occurring in their supply chains and organisations. As an SME with a turnover below the threshold of £36m, Termate Limited are excluded from compliance and the requirement to produce a slavery and human trafficking statement for each financial year of the organisation. However, we choose to follow the ethos within the act of ethical business practices and policies that protect workers from being abused and exploited in their own organisation and global supply chains.

Outlined below are the measures we have in place to support this:

## Our organisation:

As an equal opportunities' employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

### Our supply chain:

Our supply chain includes the supply of raw materials and subcomponents for incorporation within our finished goods, IT services, travel, and accommodation, building and machine maintenance, professional services including calibration and testing.

#### What we have done

We have reviewed the risks that these supply chains may present with a particular focus on those suppliers with which we have had the largest expenditure per year (excluding utilities). Suppliers representing over 50% of the value of purchases were reviewed. Where they were required to issue a statement under the Modern Slavery Act, this was obtained and reviewed. Many of our UK based suppliers are small businesses below the threshold for formal reporting. For these Suppliers we have issued a simple questionnaire requiring a response on three points; Do you have a company statement outlining the steps you have/have not taken this financial year regarding Modern Slavery that you can share with us? Have your employees and suppliers been made aware of this statement, the reasons for it and mandated to comply with it? Is this statement available on your web site?

#### What we will do

We will continue our due diligence with our Supply Chain and ensure, to the best of our ability, that they trade ethically. We will continue the review of our existing supply chain and aim to increase the proportion of our Supply Chain covered by response to questions about ethical trading, including compliance with best practice regarding the prevention of modern slavery, to 80% of our spend. We will update our process for approval of new suppliers and will ask them to commit to a zero-tolerance approach to modern slavery. We will draft an initial supplier code of conduct incorporating issues including bribery and corruption, modern slavery and data protection and seek to embed this throughout our supply chain. Alongside this process we will ensure that staff are briefed as to the importance of ensuring that new suppliers are operating to the highest standards in this regard.

### **VERSION 5**