
Modern Slavery Policy

TT Electronics (“TT”) is committed to acting ethically and with integrity in all of its business dealings. As part of this commitment, TT has adopted a zero-tolerance approach to modern slavery, as further described in this policy. This involves taking appropriate steps to implement and enforce controls designed to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Modern slavery can take various forms, including (i) servitude; (ii) forced, bonded or indentured labour; (iii) slavery; (iv) human trafficking; (v) child labor; and (vi) unreasonable restrictions on the free movement of workers. The common theme is the deprivation of an individual’s liberty in order to exploit them for personal or commercial gain.

TT’s approach to addressing the challenge of modern slavery is to ensure that there is transparency in our own business and throughout our supply chains. We expect the same high standards from all our contractors, suppliers, distributors and other business partners, consistent with TT’s obligations under the Modern Slavery Act 2015. We include specific prohibitions in our contracting processes against the use of forced, compulsory or trafficked labour, and we expect that our suppliers will hold their own suppliers to the same high standards. We may terminate our relationship with any third party if they are found to be in breach of this policy. TT’s zero-tolerance approach to modern slavery must be communicated to all contractors, suppliers, distributors and other business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

In the event of an alleged violation of our Modern Slavery policy we will conduct a thorough investigation. Should Modern Slavery be identified we will implement a remediation plan including, as appropriate, engagement with relevant authorities, stakeholders and affected parties, together with the development of corrective actions to prevent recurrence.

This policy applies to all persons working for TT and its subsidiaries, or acting on our behalf in any capacity, including directors, officers, employees, agency and part-time workers, contractors and external consultants. Any individual who fails to adhere to this policy may face disciplinary action, which could result in dismissal.

This policy has been approved by the Board of Directors of TT Electronics plc. Day-to-day responsibility for its implementation, monitoring and effectiveness lies with the Group General Counsel/ Company Secretary (Legal), the EVP Human Resources (HR) and EVP Operations & Supply Chain (Procurement). Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy.

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager, any of the individuals mentioned above, or our confidential whistle-blower helpline as soon as possible if you believe or suspect that there has been a failure to comply with this policy or that such a circumstance may occur in the future. You are also encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.