

Title:

TCS Modern Slavery and human Trafficking Policy

Policy Number TCS_QP005

Rev: 1

Date: 31/01/2023

Author: M.Sloan

Technical Composite Systems (TCS) is committed to the continuous improvement of our practices to combat modern slavery, child labour and human trafficking. TCS team members are responsible for being aware and alert to the risks of forced labour and human trafficking in our business and our supply chain and are expected to report concerns to our management, which is expected to act upon them.

Business and Organisational Structure

TCS operates from a single manufacturing site in Devon, Southwest UK. As a micro-SME we have a flat organisational structure, with excellent communication throughout the team. We recognise that as part of a supply chain, TCS interacts with both customer and suppliers and so must be aware of the impact of slavery and trafficking both “upstream” and “downstream” of our business.

Our Supply Chains

Our key supply chains involve procuring a variety of goods and services. Our suppliers are often well established and have a history of responsible trade with TCS. The evaluation and selection of suppliers for TCS’s supply chain is based on the supplier’s ability to provide goods that meet the required technical specifications as well as the need for satisfactory quality and service performance. These requirements are necessary to satisfy the movement of goods through the supply chain to fulfil TCS’s own customer expectations.

Our Policy on Slavery and Human Trafficking

This anti-slavery policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to help ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes for Slavery and Human Trafficking

Our goal is to build long standing relationships with suppliers and visit those suppliers and make clear our expectations of business behaviour. We expect these suppliers to have suitable anti-slavery and human trafficking policies and processes and conduct due diligence in their respective supply chains. As part of our induction program, new suppliers are required to disclose the tools that are in place in their supply chain to combat slavery and human trafficking.

Supplier Adherence to Our Values

We have zero tolerance for slavery and human trafficking in our business. In connection therewith, we have modified our terms and conditions of purchasing to require compliance with the Modern Slavery Act 2015 and provide for the immediate termination of the agreement in the event that we become aware that the supplier engages in any behaviour in violation of the Act.

TCS openly demonstrates a commitment to operate with professionalism and integrity. This includes our ethics policy, our anti-corruption and bribery policy and our equality diversity and inclusivity policy.

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Training

All TCS staff are trained as part of their induction process to understand and comply with the company policies. We review all company policies on an annual basis and ensure all staff are familiar with policy amendments through the staff appraisal process.

Our Effectiveness in Combating Slavery and Human Trafficking

TCS reviews and develops its policies, procedures, systems and controls to help ensure ethical practices and effective compliance is present in all of its business operations. In addition to a review of the effectiveness of the steps we have taken to combat slavery and human trafficking in our supply chains, we plan to initiate the following further steps:

1. Applying a risk-based approach to the review of suppliers within our supply chain and certification by them of compliance with the Modern Slavery Act 2015.
2. Continuing communication and personal contact with relevant team members within the purchasing organization to facilitate their understanding of, and compliance with, company expectations.
3. Reviewing and enhancing training available to the purchasing organisation to encourage further understanding of instances of modern slavery and human trafficking and compliance with the Modern Slavery Act 2015.

Signed



Michael Sloan; Managing Director