



Slavery and Human Trafficking Statement

What this policy covers:

The exploitation of labour and/or involvement in forced labour, modern slavery and human trafficking remains a blight on our global society. We all have a responsibility to be alert to the risks, however small, in our immediate business and to go beyond this and ensure checks and compliance within our wider supply chain.

Our Commitment:

The Company is committed to their zero tolerance attitude to ensure there is no modern slavery or human trafficking in our supply chain or in any part of our business. We monitor this through our SEDEX membership and their SMETA ethical audits based on the ILO conventions.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company. We recognise and uphold the ILO Conventions:

1. Freedom of Association and Protection of the Right to Organise Convention
2. Right to Organise and Collective Bargaining Convention
3. Forced Labour Convention
4. Abolition of Forced Labour Convention
5. Minimum Age Convention
6. Worst Forms of Child Labour Convention
7. Equal Remuneration Convention
8. Discrimination (Employment and Occupation) Convention

Due diligence processes for slavery and human trafficking:

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. To ensure supply chain compliance to this, Tower are Sedex Members (ZC413261815) using their ethical and social risk analysis platform, to collect and share supply chain data. This helps to map our supply chain, understand risks, and implement measures to protect people, their rights and businesses.

As part of our initiative to identify and mitigate risk the Company has in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Our supply chain providers are always with a UK provider and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

Supplier Management Framework:

As part of our Supplier Management Framework, Tower monitors all aspects of supplier performance and operates an Approved Supplier list – continued failures in a supplier's performance will eventually result in that supplier being removed from the list.

Global Standards Compliance

Suppliers are expected to have relevant third-party accreditation such as WRAP and Oeko-Tex, as well as ISO 9001 and 14001 and to be able to provide evidence of regular recognised third party audits, such as BSCI or SMETA that cover labour standards, health and safety, ethics and environmental management.

Tower Supplies

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Training:

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

All employees receive an induction into the business where our policies, procedures and expectations are outlined.

Our effectiveness in combating slavery and human trafficking:

The Company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment.

This statement is made in regard to section 54(1) of the Modern Slavery Act 2015 and is the Company's slavery and human trafficking statement. NB Tower Supplies is not required by law, to make a statement with regard to slavery and human trafficking.

Prohibited/Reportable Provisions:

- Freedom to terminate employment
- Freedom of Movement
- Freedom of Association
- Zero Tolerance of Threats including but not limited to: Violence, Harassment or Intimidation
- Worker Paid Recruitment Fees
- Compulsory Overtime
- Child Labour
- Discrimination of any kind
- Confiscation of Worker Identification Documents

Reporting suspicions of slavery:

Employees can report any suspicions of slavery either through the Company's Public Interest Disclosure (Whistleblowing) policy or externally to the Modern Slavery Helpline. Details are set out below:

<https://modernslavery.co.uk/contact.html>

0800 0121 700.

A handwritten signature in black ink, appearing to read "C. Aris".

Charlie Aris
Chief Executive Officer
June 2023