



Modern Slavery & Human Trafficking Policy

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

Organisational structure

We are a manufacturer of electrical connection products and a re-seller of associated power tools.

We have an annual turnover of £1.55m. The organisation is led by two directors. We employ a mix of consultants and employees, with approximately 10 people working in the organisation.

Our supply chains

Our supply chains are already mapped against a variety of humanitarian criteria (e.g. Conflict Minerals) and this will include slavery & human trafficking.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have put in place a designated Modern Slavery and Human Trafficking Policy.

Our Modern Slavery and Human Trafficking Policy, and our workplace policies and procedures, demonstrate our commitment to acting ethically and with integrity in all our business relationships

and to implementing and enforcing effective systems to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

Being a small company, with limited resources in place to conduct detailed due diligence, we rely on our suppliers to ensure that they have suitable and robust measures in place to combat modern slavery and human trafficking. As part of our initiative to identify and mitigate risk, we survey all our major suppliers to ensure that they are taking steps to comply with the law and have suitable procedures in place.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. Where suppliers fail to satisfy our due diligence procedures, we are committed to ceasing trading with those suppliers. We have a policy of reporting to the relevant authorities any evidence of modern slavery and human trafficking and we protect the rights and well-being of whistle-blowers.

Training & Review

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to those staff who regularly engage with suppliers. The policy is reviewed annually at the company's financial year end (end of October each year).

Approved & adopted for Total Connections 2009 Ltd by:

Andrew Sangster (Managing Director)

Ross Davies (Technical Director)