

## TOYOTA MATERIAL HANDLING UK

<b>Title:</b>	Modern Slavery and Human Trafficking Statement
<b>Risk Management:</b>	HR-90
<b>Revision Number:</b>	0001
<b>Date:</b>	This statement relates to actions and activities during the financial year: 1 April 2016 to 31 March 2017.

1.0	PURPOSE	<p>The Modern Slavery Act 2015 is an Act of the Parliament of the United Kingdom. It is designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England and Wales.</p> <p>All businesses with over a certain level of turnover are now required to publish an annual slavery and human trafficking statement, the details of which can be found in this document.</p> <p>The Modern Slavery Act 2015 (“the Act”) brings together the legislative response to modern slavery. Modern slavery encompasses human trafficking, slavery, servitude and forced or compulsory labour.</p> <p>The Act includes:</p> <ul style="list-style-type: none"> <li>✚ Criminal offences;</li> <li>✚ Law enforcement powers in relation to slavery and human trafficking;</li> <li>✚ The Independent Anti-Slavery Commissioner;</li> <li>✚ Protections for victims of slavery and human trafficking; and</li> <li>✚ Transparency in supply chains, which requires businesses above a certain size to report on the steps they are taking to ensure slavery and trafficking does not occur in their supply chain.</li> </ul>
2.0	INTRODUCTION	<p>This statement sets out TMH UK's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.</p> <p>The organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.</p> <p>The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.</p> <p>Organisational structure and supply chains:</p> <p>This statement covers the activities of TMH UK and should be read in conjunction with HR-74 listed on the local intranet.</p>

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- The compliance team will discuss any concerns or recommendations/improvements to ensure all activities especially high risk activities carried out by the company are ethical and current.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

Policies and Procedures	Head of HR
Risk Assessments:	Compliance Team – includes representatives from Finance, HR and QSE
Investigations and Due Diligence	Compliance Officer
Recruitment	Head of HR
Training:	Training Manager and Head of HR

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy: The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Team members, customers or others who have concerns can use our confidential helpline Refer to HR-75 or the company's internet and complete the disclosure form.

Employee code of conduct: The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Suppliers Code of Conduct: The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will

lead to the termination of the business relationship.

Recruitment/Agency workers: The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

#### Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier
- viewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking;
- using internal procedures suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

#### Performance indicators/Training/Recruitment

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring all Leaders to have completed training on modern slavery by January 2017;
- developing a system for supply chain verification whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains, whereby the organisation evaluates all existing suppliers.

#### Awareness-raising programme

As well as training our team members, the organisation has implemented a visible procedure listed on the intranet (HR-74) to ensure it meets all the objectives and displayed a poster in all business centers to raise awareness.

For our new suppliers we have issued a practical guide called "Transparency in Supply Chains." We are members of Stronger Together which was

launched in October 2013 as a business led multi-stakeholder collaborative initiative to equip UK employers and recruiters with the practical knowledge and resources to tackle modern slavery in their business and supply chains by providing free good practice guidance and tools through [www.stronger2gether.org](http://www.stronger2gether.org).

For existing suppliers the Supplier Code of Conduct declaration ensure our suppliers and their suppliers are aware of the importance of our stance on Modern Slavery and Human Trafficking.

The procedure HR-74 explains to all team members and suppliers working on our behalf:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation.

This statement has been approved by the organisation's board of directors, who will review and update it annually.

Director's Approval signature: 

Liam Spencer – Compliance Officer

Date: January 2016

**DISCLAIMER**

This document supersedes any previous documentation including policies and procedures previous to the date above and any company handbooks or written documentation.

**AUTHOR:** Head of Human Resources