# Modern Slavery and Human Trafficking Statement Modern Slavery Act 2015

#### 1. Introduction

This statement is made on behalf of TGA Industries Limited and is issued pursuant to our obligations under the UK's Modern Slavery Act 2015 ("MSA"). TGA Industries Limited is referred to herein as the "Company".

These obligations comprise releasing a statement, signed by a Director, which details the steps the **Company** has taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of their businesses.

The statement refers to our financial year ended 31 December 2021. We have, however, also described in this statement actions and policies implemented since that time.

#### 2. Organisational structure, business and supply chains

The Company forms part of the Fortive Corporation ("Fortive"), an international group of corporate entities whose principal activity is the production and supply of high quality, specialist technology to solve customers' critical needs. The Company is organized into three divisions (referred to herein as the "Division" and/or the "Divisions"):

- **Qualitrol (UK)** provides monitoring solutions for electrical equipment within the generation, transmission and distribution networks;
- West Control Solutions (UK) whose primary business is the design, development and manufacture of temperature controls used in a variety of commercial and industrial products across a variety of industries; and
- Gems Sensors (UK) whose principal activity is the design and manufacture of liquid level, flow and pressure sensors, switches, transducers, miniature solenoid valves, and pre-assembled fluidic systems.
- West Control Solutions (UK) and Gems Sensors (UK) report under the same business unit, Gems Sensors & Controls Inc.

All three Divisions operate both within and at the top of a global supply chain across multiple commodities.

Key countries each Division sources from:

- UK
- China
- India
- France
- Germany
- Czech Republic

- Sweden
- Lithuania
- Belgium
- USA
- Malaysia

### 3. The Company's policies in relation to slavery and human trafficking

Our Company deplores human trafficking and modern slavery in all its forms. We support the MSA and its underlying aims. It is the established policy of Fortive that workers at supplier facilities have the right to freely choose employment. Fortive further expects that all suppliers who do business with Fortive and its subsidiaries will comply with all applicable laws, including the laws against forced or involuntary labour, and this expectation is embodied in Fortive's Supplier Code of Conduct ("Supplier

Code"), available <a href="https://fortive.com/suppliers">https://fortive.com/suppliers</a>. The Company wholeheartedly supports these values and objectives.

A significant portion of Fortive's Supplier Code addresses labour standards. This part of the Supplier Code mandates fair treatment in terms of remuneration and working conditions and prohibits abusive, violent or demeaning conduct towards employees as well as precluding all forms of involuntary or child labour, including prison, bonded or indentured labour, and engagement in any form of human trafficking, as well as all forms of discrimination.

## 4. Due diligence processes in relation to slavery and human trafficking

Our methodology is to conduct Supply Chain risk assessments, based on the Global Slavery Index ("GSI") and other bodies of empirical research which highlight particular sectors where slavery is prevalent. Risk assessments are carried out annually by each Division's Supply Chain leaders with support from Fortive corporate Supply Chain team. Details of the Supplier Risk Management process are available to all employees of the Company on the internal Fortive Sharepoint.

These risk assessments involve engaging with suppliers in relation to slavery and trafficking issues, considering the content of their statutory slavery statements issued pursuant to Section 54 (where available), sending questionnaires designed to elicit relevant information to gauge a supplier's slavery and trafficking risk, gaining statements of compliance with the Fortive Supplier Code or similar and, where considered appropriate, by following up with meetings or supplementary requests for further information. We also pay particular attention to the practices of those suppliers who enjoy the highest levels of business with us.

Pass/Fail results are stored centrally on FortiveProcurement.com. All those on the preferred supplier list have been risk assessed by the Fortive corporate Supply Chain team prior to inclusion on the list. Other suppliers are added as needed through the new vendor assessment process.

## 5. Risk assessment and management

The Company is engaged in an on-going risk assessment exercise designed to identify areas of risk within its supply chain. We consider that the areas of highest risk come from suppliers who make use of facilities in those countries where the GSI indicates an elevated slavery and trafficking risk. We are aware, for example, that some manufacturing installations in Asia are known to have exploited bonded labour.

Consulting the GSI, however, we are advised that we have no direct suppliers based in areas of the world which are of the highest risk. Further, Fortive has a preferred supplier list. As stated above, all those on the preferred supplier list have undergone a risk assessment by Fortive's Supply Chain team prior to inclusion on the list.

While we have no information to suggest any of these suppliers are tainted by practices of forced labour or trafficking, we fully realise the importance of remaining vigilant and keeping this under review. This is the reason for our annual divisional risk assessments. Should any untoward issues come to light during the review our preferred process would be first to work with any supplier to remediate (if possible and appropriate), but ultimately we reserve the right to terminate any business arrangements that do not comply with our standards for suppliers.

Equally, we do not lose sight of the fact that modern slavery and human trafficking practices are also occasionally found in the UK, albeit on a smaller scale. Closer to home, therefore, we do not forget that certain industries may be prone to exploit low-skilled, low paid or migrant workers and require

them to work in conditions or under terms that are unacceptable. UK suppliers and contractors are therefore subject to the same level of scrutiny as international suppliers.

We are aware that certain employment agencies can have an elevated slavery and trafficking risk, particularly where they make travel arrangements or other arrangements on behalf of workers coming to the UK. The Company makes limited use of such agencies, but where it does, we remain equally vigilant and ensure that employment agencies are subject to the same due diligence as our other suppliers. Furthermore, where we deem it appropriate, we will ask questions about candidates during the recruitment process which are designed to spot red flags and determine whether there could be problems. We now have an MSA statement and declaration in our onboarding packs which all new starters have to sign.

#### 6. Training about slavery and human trafficking available to our staff

The Company continues to use training programs for our staff, concentrating in particular on those areas of the organisation where personnel are most likely to come into contact with slavery or human trafficking.

The global MyLearning on-line platform is in use by the Company and is available in multiple languages. This system tracks all learning and is the platform through which all compliance training is rolled out and monitored. Compliance training is managed centrally by the Fortive Compliance team and is run on an annual cycle. In 2021, we introduced the "Protecting Human Rights" module (focusing on the prevention of human trafficking, forced labour, and other forms of modern slavery), and required the majority of our global employee base to complete (with the limited exclusion of those whose roles do not have computer access).

The Supply Chain team regularly updates guidance about modern slavery and trafficking to our staff with a view to raising awareness within the organisation, directly through management channels, on our internal MS Teams Channels and through email. Regular updates are also circulated from the Fortive Trade Compliance team directly to the Supply Chain teams to ensure they are kept up to date with any changes to policy or process.

## 7. Key performance indicators to measure effectiveness of steps being taken

The Company keeps its slavery and human trafficking policies and due diligence processes under review to ensure their effectiveness in achieving the desired results. To achieve this end, each Division applies KPIs as metrics to determine whether the Company's policies and procedures are producing the desired effect, such as:

- a) the fulfilment of our due diligence program on selected suppliers within the relevant financial year. This was completed with 100% on time in 2021;
- the audit process not having given grounds for any concerns regarding modern slavery or human trafficking and not having otherwise received reports of suppliers being complicit in such practices;
  - The risk assessments in 2021 were completed and no major concerns raised. Key suppliers
    have all demonstrated compliance to our Fortive standards. We have also carried out a
    risk assessment on the use by West Control Solutions (UK) of unassessed broker vendors
    and determined that there is minimal risk.
- c) the completion of training for all key procurement and supply management personnel as well as others and the completion of follow-up quizzes by attendees, which we expect to demonstrate a high level of understanding of the subject matter;

- Formal online refresher training, Protecting Human Rights, took place in 2021. A concern reporting mechanism called Speak Up! Which includes a global hotline. This can be used by both employees as well as suppliers, individuals, or any third party with an integrity or compliance concern about our business and business practices.
- d) incorporation of a set of values into the Supplier Code with which suppliers and franchisees of Gems Sensors (UK) and West Control Solutions (UK) are requested to comply. It is being introduced in 2022 for suppliers and franchisees of Qualitrol (UK).
  - Our Modern Slavery Act Statement forms part of our service agreements and is a key element of our Supplier Risk Management process.

Our suppliers are regularly reviewed and audited as part of our Divisions' ISO 9001:2015 quality process.

## 8. Approval

This statement was approved by the board of directors of the Company on 22 November 2022.

Steve Allen
Director
TGA Industries Limited