

January 2019

TT Electronics plc - Modern Slavery Statement

TT Electronics is committed to acting ethically and with integrity in all of its business dealings. As part of this commitment, TT has adopted a zero-tolerance approach to Modern Slavery - whether in the form of servitude; forced, bonded, or indentured labour; slavery; human trafficking or any other activity that amounts to an unreasonable restriction on the free movement of workers.

Our business model is based on providing our customers with engineered products, services and expertise for performance critical applications. In meeting our customers' requirements, we operate procurement programmes through global supply chains, involving a wide network of suppliers and distributors. It is recognised that within this structure (as with all other participants operating in our business sector) the potential exists for the human rights of individual workers to be violated.

This statement is provided in compliance with the Modern Slavery Act 2015 ("the 2015 Act") and sets out the Group's, and any qualifying subsidiariesⁱ, approach to ensuring that Modern Slavery does not take place anywhere within our own business or in any of our supply chains. The following steps have been, or are in the process of being, taken in this regard:-

- The Board of TT Electronics first adopted a policy on Modern Slavery in December 2016 (the "Policy"), setting out the standards we expect from all our employees, contractors, suppliers, distributors and other business partners. The Policy was first reviewed during 2017, and has subsequently been reviewed as part of the process of preparing this Statement; it was concluded that the Policy remained fit for purpose, with no further updates being required. A copy of the Policy can be located on our website. In order to reinforce the key requirements of the 2015 Act, a copy of the Policy has been re-circulated to all of our employees (using local language translations, as appropriate).
- In 2018, we revised our Code of Business Ethics, which is available to all employees in their local language and on the TT Electronics website. The revised Code makes specific reference to TT's obligations under the 2015 Act and the standards of behaviour outlined in the Policy. Both the Code and our Policy make specific reference to the TT Electronics' whistle-blower hotline, which is available to report alleged breaches of the Policy on an anonymous basis.
- TT Electronics is a member of the Responsible Business Alliance, pursuant to which we continue to make a formal commitment to uphold the human rights of workers (at all points in the supply chain) and to treat them with dignity and respect as understood by the international community. This includes concepts covered by the remit of the 2015 Act such as "freely chosen employment" and treatment of young workers.

- We have conducted a further assessment of our employment practices and processes, which has re-confirmed that our activities are in line with the requirements of our Policy. We will continue to monitor compliance through the next financial year and implement modifications to our activities as required.
- TT Electronics carefully manages its supplier base to ensure compliance with the Group's core values. During 2017, we first implemented a digital supplier risk rating tool, as part of our due diligence processes to verify compliance across a range of "corporate responsibility" items, which specifically includes the 2015 Act. In 2018, we moved beyond the initial assessment phase of this programme and now monitor 460 suppliers, responsible for over 76 per cent of direct material spend. This figure covers all of the component parts of the Group's operations as at the beginning of 2018, together with certain business units acquired in the past year as part of the Stadium Group and Precision Inc. transactions. We will look to expand the monitoring of the Group's key suppliers still further during 2019, to include all recently acquired business units. As stated previously, we have included specific prohibitions in our contractual arrangements against the use of forced, compulsory or trafficked labour, and we expect our suppliers to hold their own suppliers to the same high standards.
- TT Electronics intends to expand its on-line training programmes to include specific training modules on Modern Slavery.

TT Electronics will continue to review its policies and processes, for the benefit of all of our stakeholders, in order to raise standards with regards to operating in an ethical and sustainable manner across our supply chains. Further details on the progress made in respect of the priorities outlined above will be made in the 2018 Annual Report, and published online simultaneously.

Approved by the Board of TT Electronics plc on 29 November 2018 and signed on its behalf by:



Richard Tyson
Chief Executive Officer

ⁱ Welwyn Components Limited and Stadium Group Limited

The following documents are ARCHIVES of previous Modern Slavery Statements from TT Electronics.

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Our business model is based on providing our customers with engineered products, services and expertise for performance critical applications. In meeting our customers' requirements, we operate procurement programmes through global supply chains, involving a wide network of suppliers and distributors. It is recognised that within this structure (as with all other participants operating in our business sector) the potential exists for the human rights of individual workers to be violated.

This statement is provided in compliance with the Modern Slavery Act 2015 ("the 2015 Act") and sets out the Group's approach to ensuring that Modern Slavery does not take place anywhere within our own business or in any of our supply chains. The following steps have been, or are in the process of being, taken in this regard:-

- The Board of TT Electronics first adopted a policy on Modern Slavery in December 2016 (the "Policy"), setting out the standards we expect from all our employees, contractors, suppliers, distributors and other business partners. The Policy was reviewed during 2017, as part of the process of preparing this Statement; it was concluded that the Policy remained fit for purpose, with no further updates being required. A copy of the Policy can be located on our website. In order to reinforce the key requirements of the 2015 Act, a copy of the Policy was re-circulated to all of our employees (using local language translations, as appropriate) in January 2018.
- We are in the process of revising our Code of Business Ethics, which will be made available to all employees in their local language and on the TT Electronics website. The revised Code will make specific reference to TT's obligations under the 2015 Act and the standards of behaviour outlined in the Policy. Both the Code and our Policy make specific reference to the TT Electronics' whistleblower hotline, which is available to report alleged breaches of the Policy on an anonymous basis.
- TT Electronics is a member of the Responsible Business Alliance (formerly the Electronic Industry Citizenship Coalition). As such, we continue to make a formal commitment to uphold the human rights of workers (at all points in the supply chain) and to treat them with dignity and respect as understood by the international community. This includes concepts covered by the remit of the 2015 Act such as "freely chosen employment" and treatment of young workers.
- We have conducted a further assessment of our employment practices and processes, which has re-confirmed that our activities are in line with the requirements of our Policy. We will continue

to monitor compliance through the next financial year and implement modifications to our activities as required.

- TT Electronics carefully manages its supplier base to ensure compliance with the Group's core values. During 2017, a digital supplier risk rating tool was implemented across TT Electronics' operations, as part of our due diligence processes to verify compliance across a range of "corporate responsibility" items, which specifically includes the 2015 Act. As an initial exercise, compliance was assessed by reviewing over 60 of the Group's key suppliers. By year end, this verification programme was expanded to over 260 suppliers, representing some 80 per cent of direct material spend. During 2018, we will look to expand monitoring of the Group's key suppliers still further. As stated last year, we have also included specific prohibitions in our contractual arrangements against the use of forced, compulsory or trafficked labour, and we expect our suppliers to hold their own suppliers to the same high standards.
- TT Electronics is in the process of expanding its on-line training programmes to include specific training modules on Modern Slavery.

TT Electronics will continue to review its policies and processes, for the benefit of all of our stakeholders, in order to raise standards with regards to operating in an ethical and sustainable manner across our supply chains. Further details on the progress made in respect of the priorities outlined above will be made in the 2018 Annual Report, and published online simultaneously.

Approved by the Board of TT Electronics plc and signed on its behalf by:



Richard Tyson
Chief Executive Officer

21st December 2016

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- The Board of TT Electronics adopted a policy on Modern Slavery in December 2016 (the "Policy"), setting out the standards we expect from all our employees, contractors, suppliers, distributors and other business partners. A copy of the Policy can be located on our website. The Policy was launched through a communication programme available (in the local language) to all of our employees.
- We are in the process of revising our Code of Business Ethics, which will be made available to all employees in their local language and on the TT Electronics website. The revised Code will make specific reference to TT's obligations under the 2015 Act and the standards of behaviour outlined in the Policy. Both the Code and our Policy make specific reference to the TT Electronics' whistle-blower hotline, which is available to report alleged breaches of the Policy on an anonymous basis.
- TT Electronics is a member of the Electronic Industry Citizenship Coalition. As such, we have made a formal commitment to uphold the human rights of workers (at all points in the supply chain) and to treat them with dignity and respect as understood by the international community. This includes concepts covered by the remit of the 2015 Act such as "freely chosen employment" and treatment of young workers.
- We have conducted an initial assessment of our employment practices and processes, which has confirmed that our activities are in line with the requirements of our Policy. We will continue to

monitor compliance through the next financial year and implement modifications to our activities as required.

- TT Electronics carefully manages its supplier base to ensure compliance with the Group's core values. Following the introduction of the Policy, we have included specific prohibitions in our contractual arrangements against the use of forced, compulsory or trafficked labour, and we expect our suppliers to hold their own suppliers to the same high standards. During 2017, we will be undertaking an assessment of the Group's suppliers by size/risk and will request that our largest suppliers provide details on their strategy and approach to compliance with the 2015 Act. We intend to roll this process out across a wider group of suppliers in subsequent years, and to ensure that this approach is adopted as a matter of course in the due diligence processes we adopt on the appointment of new participants in the supply chain.
- TT Electronics has developed a comprehensive training programme which covers key areas of compliance such as Anti-Bribery. We are looking to expand these training modules in the coming year to cover Modern Slavery.

TT Electronics will continue to review its policies and processes, for the benefit of all of our stakeholders, in order to raise standards with regards to operating in an ethical and sustainable manner across our supply chains. Further details on the progress made in respect of the priorities outlined above will be made in the 2017 Annual Report, and published online simultaneously.

Yours Sincerely



Richard Tyson
Chief Executive Officer