



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1 PURPOSE

The purpose of this Policy is to set out the values, principles and responsibilities TGV adheres to with regard to modern slavery and human trafficking, and which TGV expects from all Associated Persons (APs) including the company's Suppliers, Agents, Joint Venture Partners, Representatives, Intermediaries, Consultants, Contractors, Employees, Advisors and other intermediaries representing the Company.

2 SCOPE

- 2.1 This Policy applies to TGV International Limited and any company which at the relevant time is a subsidiary or holding company of TGV International Limited (the Group). Any reference to "the Company" in this Policy refers to TGV International Limited and every member of the Group.
- 2.2 This Policy applies to all personnel employed by or engaged to provide services to the Company, including, but not limited to, TGV's employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this Policy, "employees").
- 2.3 Every TGV employee is responsible for reading, understanding and complying with this Policy.
- 2.4 TGV managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them.
- 2.5 All APs are required to comply with this Policy. Local laws, custom and practice do not justify any departure from this Policy.
- 2.6 If you have any questions or concerns relating to this Policy, consult TGV management. If you learn of any conduct that you believe may violate this Policy, report it immediately.
- 2.7 This Policy does not form part of any employee's contract of employment and the Company may amend this Policy at any time. However, any breach of this Policy is a disciplinary offence under any employee of the Company's terms of employment.



3 MODERN SLAVERY & HUMAN TRAFFICKING DEFINITION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, 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:

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| <u>Slavery</u> | Exercising powers of ownership over a person |
| <u>Servitude</u> | The obligation to provide services is imposed by the use of coercion |
| <u>Forced or compulsory labour</u> | Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily |
| <u>Human trafficking</u> | Arranging or facilitating the travel of another person with a view to their exploitation |

4 IDENTIFYING SLAVERY

4.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- The person is withdrawn, or they appear frightened.
- The person does not seem to be able to contact friends or family freely.
- The person has limited social interaction or contact with people outside their immediate environment.

4.2 The list above is not exhaustive.

4.3 A person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking.



5 POLICY STATEMENT

- 5.1 The Company does not tolerate modern slavery and the Company is committed to acting ethically and with integrity in all of the Company's business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the Company's business or in any of the Company's supply chains.
- 5.2 The Company is also committed to ensuring there is transparency in the Company's business and in the Company's approach to tackling modern slavery throughout the Company's supply chains. The Company expects the same high standards from all APs and expects that all APs will hold their own suppliers to the same high standards.
- 5.3 The Company prohibits trafficking in persons and slavery. The Company's employees, contractors, subcontractors, vendors, suppliers, partners and others through whom the Company conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:
- Engaging in any form of trafficking in persons;
 - Procuring commercial sex acts;
 - Using forced labor in the performance of any work;
 - Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
 - Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided by the Company), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;
 - Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
 - Charging applicants/candidates recruitment fees;
 - If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;
 - If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or
 - If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.



5.4 The Company will:

- Maintain clear policies and procedures preventing exploitation and human trafficking, and protecting the Company's workforce and reputation;
- Be clear about the Company's recruitment policy;
- Check the Company's Supply Chains;
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers etc. to ensure the Company knows who is working for the Company;
- Ensure the Company has in place an open and transparent grievance process for all staff;
- Seek to raise awareness so that the Company's colleagues know what the Company is doing to promote their welfare; and
- Make a clear annual statement that the Company's takes its responsibilities to its employees and its clients seriously.

5.5 Managers will:

- Listen and be approachable to colleagues;
- Respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
- Remain alert to indicators of slavery;
- Raise the awareness of the Company's Employees by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do; and
- Use their experience and professional judgement to gauge situations.

5.6 The Company and APs all have responsibilities under this Policy. Whatever role or level of seniority, Employees must:

- Keep their eyes and ears open - if an Employee suspects someone (a colleague or someone in the Company Supply Chain) is being controlled or forced by someone else to work or provide services, follow the Company's reporting procedure;
- Follow the Company's reporting procedure if a colleague tells them something they think might indicate they are or someone else is being exploited or ill-treated; and
- Tell the Company if they think there is more the Company can do to prevent people from being exploited.



5.7 Treatment of People:

- APs must not use any form of forced, bonded or involuntary labour, and workers must not be obliged to lodge identity papers or pay any deposit as a condition of work.
- Workers in AP's Supply Chain must not be subject to physical or verbal abuse or threats or intimidation of any description.
- Workers must not be required to work extreme hours or work without adequate rest periods.
- APs must not use workers under the age of 18, or the minimum legal working age in the country in question, if higher than 18. APs must accept the principles of remediation of child and under age workers, and where such labour is discovered APs must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.
- Factories and work sites used by APs must be safe and hygienic with an adequate number of safe and accessible fire exits from all buildings including living accommodation and workers must have access to drinking water.
- Workers' life or limb must not be endangered due to the use of dangerous machinery, unsafe building structure or layout, or hazardous chemicals. Where serious or fatal accidents have occurred APs must demonstrate to the Company's satisfaction that all appropriate steps have been taken to prevent similar accidents occurring in the future.
- Accommodation, where provided, must be in buildings that are separate from other areas of the workplace and have an adequate fire alarm system.
- APs must pay wages which are fair i.e. sufficient to meet basic needs and to provide some additional income.
- APs must maintain proper and accurate employment records including calculation of pay and hours worked, and APs must be transparent and cooperative with regard to the inspection of employment records.

5.8 Supply Chains:

- The Company will thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.
- The Company will tell any suppliers it does business with that the Company is not prepared to accept any form of exploitation.
- The Company will periodically conduct AP audits, including site visits to review working practices and conditions at AP's premises, to ensure expected standards are being met.
- When establishing key contracts with APs, the Company may visit the delivery sites located in the country of origin where the labour is based to satisfy itself that the AP and specific sites comply with the Company's approach to modern slavery.



5.9 Recruitment:

- The Company's HR Manager follows firm policy and will only use agreed specified reputable recruitment agencies.
- To ensure the potential for slavery and human trafficking is reduced as far as possible, the Company will thoroughly check recruitment agencies before adding them to a list of approved agencies. This includes:
 - Conducting background checks.
 - Investigating reputation.
 - Ensuring the staff it provides have the appropriate paperwork (e.g. work visas).
 - Ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying.
- The Company will keep agents on the list under regular review.
- The Company always ensures that all Employees have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- The Company always ensure that Employees are legally able to work in the country where their work is carried out.
- The Company checks the names and addresses of its Employees (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- The Company provides information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- If, through the Company's recruitment process, the Company suspects someone is being exploited, the HR Manager will follow the Company's reporting procedures.

6 INVESTIGATIONS AND AUDITS

The Company may perform investigations and audits from time to time to verify that business is being conducted in compliance with this Policy. All Company employees and third parties through whom the Company conducts business are required to fully and promptly cooperate with the Company's internal and external auditors and investigators, and must respond fully and truthfully to their questions, requests for information, and documents. Any failure by an employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting email or other documents, may be grounds for disciplinary action, up to and including termination, subject to applicable law.



7 RESPONSIBILITY FOR THE POLICY

- 7.1 The Board of Directors has overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it.
- 7.2 The HR Manager has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 7.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery in Supply Chains.
- 7.4 Employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR Manager.

8 COMPLIANCE WITH THE POLICY

- 8.1 APs must ensure that they read, understand and comply with this Policy.
- 8.2 The Company operates a policy of individual accountability. Each AP is accountable for compliance with this Policy.
- 8.3 The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under the Company's control. APs are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 8.4 APs must notify their Manager or the HR Manager as soon as possible if they believe or suspect that a conflict with this Policy has occurred or may occur in the future.
- 8.5 APs are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage.
- 8.6 If an AP believes or suspects a breach of this Policy has occurred or that it may occur, they must notify their Manager or the HR Manager or report it as soon as possible.
- 8.7 If an AP is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, then they must raise it with their Manager or the HR Manager.



- 8.8 The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the Company's business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If an AP believes that they have suffered any such treatment, they should inform the HR Manager immediately. If the matter is not remedied, and the AP is an employee, they should raise it formally to the Company's management.

9 COMMUNICATION AND AWARENESS OF THE POLICY

- 9.1 Training on this Policy, and on the risk the Company faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for the Company, and regular training will be provided as necessary.
- 9.2 This Policy must be communicated to all APs at the outset of the Company's relationship with them and reinforced as appropriate thereafter.

10 REPORTING METHODS RELATED TO THE POLICY

Every AP member must report any incidence or suspicion of modern slavery or human trafficking as described in the Policy, at the earliest possible stage:

- If Company employee, by telling his/her direct manager, by sending email to the Company's HR Manager Amber Peng: amber.peng@tgv-international.com or by leaving a written note in one of the two dedicated boxes located in the Company's production area and management office area.
- If supplier, by sending email to the Company's Purchaser Sophie Li: sophie.li@tgv-international.com

11 BREACHES OF THE POLICY

- 11.1 Any Employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 11.2 The Company may terminate its relationship with an AP if they breach this Policy.

Gerard Coron
General Manager & Managing Director
01 June 2019

