

Modern Slavery Policy

Author: Mary de Villiers
Revision: 3
Review Date: October 2025

Date: October 2018
Revised: October 2023

MODERN SLAVERY POLICY

1. Introduction

- 1.1. TTC Group (UK) Limited is unwavering in its commitment to ethical conduct and integrity in all business dealings. In alignment with this commitment, this Modern Slavery Policy is established to ensure the eradication of slavery and human trafficking in any form within our operations and supply chains.
- 1.2. Our diverse supply chains are critical to our operations. We pledge to maintain sustainable, ethical, and socially responsible supply chain management. This includes ensuring that our suppliers are economically viable, adhere to our ethical standards, and undergo rigorous vetting in various domains, such as environmental impact, quality management, financial health, legal compliance, diversity, sustainability, and social responsibility.

2. Policy Statement

- 2.1. Modern slavery, in its various forms including slavery, servitude, forced and compulsory labour, and human trafficking, is a criminal act and a fundamental human rights violation. TTC Group (UK) Limited adopts a zero-tolerance approach to modern slavery. We are committed to ethical business practices and the implementation of robust systems to guarantee the absence of modern slavery in our business and supply chains. We also aim for transparency in our operations, in line with the Modern Slavery Act 2015, and expect similar standards from all our partners.
- 2.2. This policy applies to all individuals working for or on behalf of TTC Group (UK) Limited in any capacity, including employees, directors, agency workers, volunteers, agents, contractors, consultants, and business partners.
- 2.3. This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. Responsibility for the Policy

- 3.1. The board of directors holds overall responsibility for ensuring compliance with legal, ethical obligations, and this policy.
- 3.2. The HR Director is primarily responsible for implementing this policy, monitoring its effectiveness, and conducting regular audits of internal control systems to counter modern slavery.
- 3.3. Managers at all levels are tasked with ensuring their teams understand and adhere to this policy, including providing adequate training on modern slavery issues.

4. Compliance with the Policy

- 4.1. All employees must read, understand, and comply with this policy.
- 4.2. The detection and prevention of modern slavery in our business and supply chains is a collective responsibility. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 4.3. Any suspicions or conflicts with this policy should be reported to the HR Director immediately
- 4.4. We encourage early reporting of concerns about modern slavery in any part of our business or supply chains.
- 4.5. If uncertain about any aspect of modern slavery or suspect a breach of this policy has occurred or that it may occur, you should notify your manager or HR Department or report it in accordance with our

Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

- 4.6. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or HR Department.
- 4.7. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Director immediately. If the matter is not remedied and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Group HR System.

5. Communication and Awareness of the Policy

- 5.1. Induction for new staff includes training on this policy and the risks of modern slavery. Regular updates and training will be provided.
- 5.2. Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the start of our business relationships and regularly reinforced.

6. Breaches of this Policy

- 6.1. Employees found breaching this policy may face disciplinary action, up to and including dismissal for gross misconduct.
- 6.2. Relationships with other individuals and organisations will be terminated if they fail to comply with this policy.

From time-to-time policies and procedures are updated. Please refer to the Companies HR system for the latest version.