

**Title of Policy/Procedure:** Modern Slavery Statement

**Revision Number:** 0001

**Date reviewed:** April 2018/19

---

## Introduction

This statement sets out Toyota Material Handling UK's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains. This statement relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

The company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in all of our corporate activities, and to ensure that our supply chains are free from slavery and human trafficking.

## Organisational structure and supply chains

This statement covers the activities of Toyota Material Handling UK

Toyota Material Handling UK Limited sells hires and services materials handling equipment to customer and through a network of independent dealers. Our operations are based at ten centres across the UK and we employ over 900 people with an annual turnover of £200 million.

Our key supply chains are extensive, but the majority of products supplied come from other companies within the Toyota Material Handling Group. We continue to review existing suppliers to identify any areas of risk and we also monitor our utilisation of agency team members in the UK, working with providers to ensure effective processes are in place.

## Countries of operation and supply

The organisation currently operates in the following countries:

France, Spain, Sweden, Austria, Belgium, Switzerland, Czech, Holland, Denmark, Finland, Greece, Hungary, Norway, Poland, Romania, Russia, Slovakia, Brussels, Baltic.

## *Responsibility*

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

- **Policies:** The Head of Human Resources is responsible for putting in place and reviewing policies and the process by which they were developed.

- **Risk assessments:** The Compliance Team is responsible for human rights and modern slavery risk analysis.
- **Investigations/due diligence:** The Compliance Team is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** All team members are trained and developed on the importance and understanding of slavery and human trafficking risks. All suppliers sign up to the company's Code of Conduct before trading

### 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 team members, 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 team members to make disclosures, without fear of retaliation. Team members, customers or others who have concerns can [use our confidential helpline/complete our confidential disclosure form].
- **Team member code of conduct** The organisation's code makes clear to team members the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of team member conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement 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 team members 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 team members policy** 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 team members from that agency. All agencies are interviewed using an agreed process and due diligence as well as credentials and references obtained.

### Due Diligence

Toyota Material Handling UK 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;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;

## MATERIAL HANDLING

- conducting supplier audits or assessments through [the organisation's own staff/third party auditor], which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through a third party auditing process and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular such as participation in "Stronger together";
- using details of ethical supplier database, where 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

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation:

- requires all team members to have completed training on modern slavery within the first four weeks of employment;
- developing a system for supply chain verification [in place since [date] / expected to be in place by [date] ], whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviews its existing supply chains on a regular basis.

### Training

The organisation requires all team members to complete training on modern slavery as a module within the organisation's wider human rights/ethics/ethical trade training programme through Leadership training or induction.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

## MATERIAL HANDLING

- what external help is available, for example through the Modern Slavery Helpline and the "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

### **Awareness-raising programme**

As well as training our team members, the organisation has raised awareness of modern slavery issues by training, posters and policies.

The posters explain to all team members:

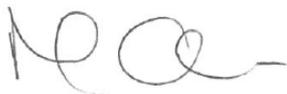
- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what team members can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

The company has signed up to the "Stronger Together" forum to keep abreast of steps to go further to prevent modern slavery in our supply chains. Part of the aim of Stronger Together is to provide a network and space for businesses to share challenges and the learning. Stronger Together encourages best practice through knowledge sharing.

### **Board/Member approval**

This statement was approved on 1<sup>st</sup> April 2018 by the organisation's board of directors, who review and update it annually.

### **Director's signature:**



Michelle Clark – Head of HR

### **Date:**

30<sup>th</sup> April 2018