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### Reference documents

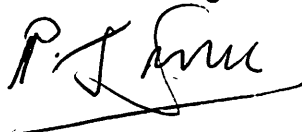
Documents	Associated processes	Associated procedures
		Whistleblowing policy Anti-corruption and bribery policy

## Modern Slavery Act 2015 Statement Slavery and Human Trafficking Statement

### Introduction from Peter Smith – Chairman

TIA (GB) Ltd is committed to taking all necessary steps to ensure that our company policies and working practices help combat the global issues of slavery and human trafficking.

We will regularly review the measures we take to ensure that our policy remains robust and appropriate. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.



**Peter Smith**  
Chairman – TIA (GB) Ltd

### ORGANISATION'S STRUCTURE

All the companies held under TIA (GB) Ltd ("Group"), are a global specialist distributor of tyres to a worldwide market. Our Head Office is based in Telford, UK. TIA Group is present in more than 63 countries.

The trading companies within the group are:

- TIA (GB) Ltd
- TIA Wheels Ltd
- Veetireco UK Ltd
- TIA Mexico

### OUR BUSINESS

TIA (GB) Ltd t/a Treadsetters was established in 1999 and has grown rapidly into one of the principal UK, European and Global tyre wholesalers and distributors of truck & bus, passenger car, high performance car, Agricultural, 4X4, van tyres and a comprehensive range of commercial wheels.

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We wholesale through our warehouse in the UK and have exported tyres globally through direct containers into more than 63 countries worldwide. We also specialise in brand development. We distribute our own brand “Torque” and work with factories to develop their brands in different markets. At present there are 58 people employed throughout the Company, with a turnover of £96 million in 2018.

### **OUR SUPPLY CHAIN**

TIA (GB) Ltd supply chain includes stocking, warehousing and distribution. We also source products from a number of tyre manufacturers. We have a range of suppliers from UK, Ireland and from around the world. As part of our tendering process, we require suppliers to support and demonstrate our values, which is an essential component of our approach to Corporate Social Responsibility.

Many of our suppliers hold international quality standards and accreditations and are regularly audited by the issuing authorities to ensure adherence to these requirements. We also audit a selection of our suppliers to check compliance with our company’s quality standards. Our suppliers all conform to accredited assurance schemes that are relevant to their geographical location and product supplied. These assurance schemes must also comply with all EU legislation.

The Group’s supply chain is comprised of suppliers throughout the world that provide a wide range of products and services related to the manufacturing, development, marketing and distribution. The Group strives to do business with reputable suppliers committed to the Group’s ethical standards and business practices.

Overall, our business involves the distribution and wholesaling of tyres across the UK and worldwide. Our supply chain therefore primarily involves the purchase and distribution of tyres. It is complex and global in nature.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We expect all of our directors, employees and suppliers to act with honesty, integrity and fairness. Our business principles set out the standards we set ourselves to ensure we operate lawfully, with integrity and with respect for others. As part of this commitment, we are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains or in any part of our business.

### **RELEVANT POLICIES**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

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2. Anti-bribery policy. This policy clearly states that staff must not accept gifts or cash in exchange for services. Any gifts from customers or suppliers must be declared to directors.
3. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

We will be reviewing our policies regularly to ensure they reflect current best practice and will be adding other appropriate policies as they are identified.

### **DUE DILIGENCE AND AUDITS**

Due diligence is undertaken at a Group or local level (as appropriate) when selecting suppliers. This addresses the corporate social responsibility policy of potential suppliers.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistle blowers

### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our Company, all Directors have been briefed on the subject and we provide regular, relevant updates on how to implement and adhere to this policy to members of staff and forms part of our induction process for all new employees. Through this training, as well as through Group internal communications, all employees are encouraged to identify and report any potential or actual wrongdoing that they consider to be negligent, improper or illegal to a designated person. This information will be kept strictly confidential.

### **FURTHER STEPS**

As part of any tender process, we will ask prospective suppliers to confirm compliance with the Modern Slavery Act at the pre-qualifying questionnaire stage. We will not progress to working with any supplier which does not comply with the Act.

### **APPROVAL BY THE DIRECTORS**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the TIA (GB) Ltd Board of Directors.

### **RESPONSIBILITY FOR THIS POLICY**

The Company's Board of Directors have approved and issued this policy as part of its overall responsibility for ensuring the group complies with its legal and ethical obligation, and the whole company.

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Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy, and are given adequate and regular training on it.

### **MONITORING AND REVIEW**

Our Finance Director will monitor the effectiveness and review the implementation of this policy regularly, and will report to the Board of Directors on its suitability and effectiveness. Any improvements identified by the Board of Directors will be made as soon as possible.

End of last financial year: 31 March 2018

Approved by the Board on: 30 September 2018