

Modern Slavery and Human Trafficking Statement

Modern Slavery Act 2015

1. Introduction

This statement is made on behalf of TGA Industries Limited and is issued pursuant to our obligations under the UK's Modern Slavery Act 2015 ("MSA").

TGA Industries Limited is referred to herein as the "**Company**".

These obligations comprise releasing a statement, signed by a Director, which details the steps the **Company** have taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of their businesses. We also intend to make this statement available in a prominent position on our website.

The statement refers to our financial year ending 31 December 2018. We have, however, also described in this statement actions and policies implemented since that time.

2. Organisational structure, business and supply chains

TGA Industries Limited forms part of the Fortive Group ("**Fortive**"), an international group of corporate entities whose principal activity is the production and supply of high quality, specialist technology to solve customers' critical needs.

TGA Industries Limited is organized into four divisions (hereinafter referred to herein as the "**Division**" and/or the "**Divisions**"):

- Gilbarco Veeder-Root, which principal activity is the provision of petrol retail forecourt products and the service and installation of such equipment;
- Qualitrol (UK), specialized in the condition based monitoring across the globe for utility assets;
- West Control Solutions (UK) which primary business is the design, development and manufacture of Temperature controls used in a variety of commercial and industrial products across a variety of industries; and
- Gems Sensors Ltd which principal activity is the design and manufacture of liquid level, flow switches and pressure switches, sensors and transducers, miniature solenoid valves, and pre-assembled fluidic systems.

3. TGA Industries Limited's policies in relation to slavery and human trafficking

Our Company and its wider group deplore human trafficking and modern slavery in all its forms. We support the MSA and its underlying aims.

It is the established policy of the Fortive Group that workers at supplier facilities have the right to freely choose employment. Fortive further expects that all suppliers who do business with Fortive and its subsidiaries will comply with all applicable laws, including the laws against forced or involuntary labour, and this expectation is embodied in Fortive's Supplier Code of Conduct, available [here](#). The Company wholeheartedly support these values and objectives.

A significant portion of Fortive's Code of Conduct for Suppliers addresses labour standards. This part of the Code of Conduct mandates fair treatment in terms of remuneration and working conditions and prohibits abusive, violent or demeaning conduct towards employees as well as precluding all forms of involuntary or child labour, including prison, bonded or indentured labour, and engagement in any form of human trafficking, as well as discrimination.

Fortive publishes a human trafficking and slavery statement pursuant to the California Transparency in Supply Chains Act 2010, which is available [here](#).

4. Due diligence processes in relation to slavery and human trafficking

During the financial year ending 31 December 2018, our Company considered its response to the MSA. Having done so and having taken advice, our Company is embarking in the current financial year on implementing updating a system of checks on suppliers. Our methodology is to conduct a periodic risk assessment, based on the Global Slavery Index ("GSI") and other bodies of empirical research which highlight particular sectors where slavery is prevalent.

These checks involve engaging with suppliers in relation to slavery and trafficking issues, considering the content of statements issued pursuant to Section 54 (where available), sending questionnaires designed to elicit relevant information to gauge a supplier's slavery and trafficking risk or where considered appropriate by following up with meetings or supplementary requests for further information. Where available, we will review the content of statutory slavery statements issued by organisations pursuant to Section 54. We also intend to pay particular attention to the practices of those suppliers who enjoy the highest levels of business with us.

5. Parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk

The Company is engaged in an on-going risk assessment exercise designed to identify areas of risk within its supply chain. To that end, we are assisted by a City law firm who provided advises in order to identify areas of risk and made recommendations for steps to take to alleviate that risk.

We consider that the areas of highest risk come from suppliers who make use of facilities in those countries where the GSI indicates an elevated slavery and trafficking risk. We are aware, for example, that some manufacturing installations in Asia are known to have exploited bonded labour.

The Company has a global supply chain. Consulting the GSI, however, we have no direct suppliers based in areas of the world which are considered to be medium or high risk. We do, on the other hand, have a limited number of suppliers who are engaged in the manufacture of certain hardware sold by the Company.

Whilst we have no information to suggest any of these suppliers are tainted by practices of forced labour or trafficking, we fully realise the importance of remaining vigilant and keeping this under review.

Equally, we do not lose sight of the fact that modern slavery and human trafficking practices are also occasionally found in the UK, albeit on a smaller scale. Closer to home, therefore, we do not forget that certain industries may be prone to exploit low-skilled, low paid or migrant workers and require them to work in conditions or under terms that are unacceptable. These known problems are examples of issues where the Company and its Divisions will be vigilant in our due diligence exercise.

Our due diligence efforts, to date, have revealed an encouragingly high level of awareness of modern slavery and trafficking amongst those of the Company' suppliers who engage low-paid or menial workers. To that end, for example the Company have made recommendations to one supplier as to how it can further improve its anti-slavery practices and policies.

We are also aware that certain employment agencies can have an elevated slavery and trafficking risk, particularly where they make travel arrangements or other arrangements on behalf of workers coming to the UK. The Company, however, make limited use of such agencies, meaning our exposure to this particular trafficking risk is low. Nonetheless, we will remain vigilant and ensure that employment

agencies form a part of our due diligence efforts. Furthermore, where we deem it appropriate, we will ask questions about candidates during the recruitment process which are designed to spot red flags and determine whether there could be problems.

6. Training about slavery and human trafficking available to our staff

The Company implemented and will continue to use training programs for our staff, concentrating in particular on those areas of the organisation where personnel are most likely to come into contact with slavery or human trafficking.

The Company will also circulate fact sheets about modern slavery and trafficking to our staff with a view to raising awareness within the organisation.

7. Effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains, measured against such performance indicators as are considered appropriate

The Company will keep its slavery and human trafficking policies and due diligence processes under review to ensure their effectiveness in achieving the desired results. To achieve this end, each Division will apply KPIs as metrics to determine whether the Company's policies and procedures are producing the desired effect, such as:

- a) the fulfilment of our due diligence program on selected suppliers within the relevant financial year;
- b) the audit process not having given grounds for any concerns regarding modern slavery or human trafficking and CRS not having otherwise received reports of suppliers being complicit in such practices;
- c) the completion of training for all key procurement and supply management personnel as well as others and the completion of follow-up quizzes by attendees, which we expect to demonstrate a high level of understanding of the subject matter;
- d) the implementation of an operational whistleblowing facility for staff to enable them to report suspicions of modern slavery or human trafficking occurring in the business or supply chain;
- e) incorporation, within the financial year, of a set of values into the manual with which franchisees are required to comply.

8. Approval

This statement has been approved by the board of directors of the Company, which have delegated approval of this statement on its behalf to the Directors of each of functional businesses in the Company.



Trevor Sinkinson

Director

TGA Industries Limited

19 March 2019