

# TAMURA EUROPE LTD

## ANNUAL MODERN SLAVERY STATEMENT

### Financial Year Ended 31<sup>st</sup> December 2021

This statement is made pursuant to section 54, Part 6 of the Modern Slavery Act 2015, and sets out the steps that Tamura Europe Limited has taken and is continuing to take to ensure that slavery and human trafficking are not taking place in any part of the business or in our supply chains.

This statement constitutes our slavery and human trafficking statement approved by the Board of directors of Tamura Europe Limited and relates to the financial year ended December 31, 2021. The scope of markets included in this Statement covers our operations within Tamura Europe group, including those of our direct subsidiaries and joint venture operations.

#### **About Tamura Europe Limited**

Tamura Europe Limited is part of the Tamura Corporation, a world-class manufacturer of high quality electronic components for the global industrial, telecom and consumer markets. As part of the Tamura Corporation we invest in our customers' future by providing an avenue of product development that promotes local engineering, low cost manufacturing coupled with local logistics, technical and quality support.

The principal activity of the company continued to be the manufacture and sale of transformers, wound components, battery chargers, power supplies and the assembly of switch boxes. The company has branch operations in the Czech Republic, France, and India, in addition to having two subsidiaries Romarsh Limited and Tamura Magnetics Engineering S.r.l, located in the UK and Italy respectfully.

#### **Company and Approach and principles**

Tamura Europe Limited takes pride in conducting our business responsibility and to the highest ethical standards. The observance of ethics and integrity have been an integral management principle throughout the Tamura Europe Group throughout its history. The Code of Practice of the Tamura Group govern our activities, our values and the way we work.

Tamura Europe Limited supports fully the principles and provisions set out in the Modern Slavery Act 2015 ("the Act"). The board is committed to identifying Modern Slavery risks across its business and supply chain which include, slavery, human trafficking, child labour and forced/compulsory labour in any form (together "Modern Slavery") and to ensuring that there is no Modern Slavery either within its businesses or with its principal supply chains. The business acknowledges its responsibility to respect

Registered in London No. 463530. Registered Office: Tamura- Europe Ltd. Clark Avenue, Porte Marsh Road, Calne, Wiltshire. SN11 9BS

Telephone : + 44 (0)1380 731 700 • Fax : + 44 (0)1380 731 702  
email : [business@tamura-europe.co.uk](mailto:business@tamura-europe.co.uk)

human rights as set out within both the UK Modern Slavery Act 2015 (“Act”) and guidelines set out in the International Bill of Human Rights.

Together with ensuring continuous compliance to the Tamura Corporation global code of practice with regards to Human rights policies and practices. Maintaining Our focus on the most salient human rights risks of relevance to an international corporation, including matters related to labour rights among our employees and in our supply chain.

The business is fully committed to implementing the Guiding Principles on Business and Human Rights throughout our operations. Respect for the dignity of the individual and for the importance of each individual’s human rights forms the basis of the behaviours we expect of every individual who works for us, either as a direct Tamura Europe Limited employee or indirectly through our supply and value chain.

The business has zero-tolerance approach to any form of modern slavery and does not accept any form of discrimination, harassment or bullying within Tamura Europe group or its supply chain. To this end we require all of our managers to implement processes designed to ensure equality of opportunity and inclusion for all Tamura Europe employees as well as for individuals employed in our supply chain. These include requiring suppliers to take measures to avoid any form of forced, bonded or compulsory labour (or any other kind of modern slavery or human trafficking).

### **Risk assessment and Management**

When the UN Guiding Principles on Business and Human Rights were first published in 2011, we analysed the approach to human rights then in place across Tamura Europe, Integrity and Supply Chain functions in Tamura Europe to further strengthen our policies and processes that address modern slavery risks within our operations and supplier base. We are confident in our management and assessment of the risk exposure to modern slavery and human trafficking in our operations and our supply chain, but we appreciate that further due diligence and risk assessment needs to be undertaken. In 2021, this cross functional team will continue to lead assessment of Tamura Europe’s potential exposure across our operating business and our global supply chain. This analysis will in turn determine whether any changes are required to the program and associated compliance mechanisms. — Tamura Europe Ltd – Modern Slavery and Human Trafficking Statement the information in this Statement has been approved by the Board of directors of Tamura Europe Ltd and relates to the financial year ended December 31, 2021.

### **Codes and policies**

Tamura Europe Limited has continued to apply compliance to the Tamura Corporation Code of conduct and maintained its continuous efforts to ensure there is none knowingly child or forced labour within our operations or our supply chain.

The Tamura Europe Limited Group does not generally operate in markets/sectors that present a higher risk of Modern Slavery. We recognise that while we have controls, measures and reporting procedures in place, there is more to do and will require continuous development.

## **Education and Training**

The business continues awareness of potential risk of its employees and suppliers of risk of its responsibility to respect human rights as set out within both the UK modern slavery act 2015 and guidelines set out in the in the International Bill of Human Rights.

Tamura Europe Limited Modern Slavery Policy and Statement are published on our corporate website. The Company's operates a robust recruitment policy, including recruitment and selection processes address modern slavery issues in the context of assessment of eligibility and rights to live and work, identity checks (including ensuring that employees can provide evidence that they are in possession of their own identification documents), and verification of references for permanent and temporary staff.

The group HR function is centrally controlled and managed with appropriate controls and policies to safeguard the rights and welfare of its employees including policies on Grievance, Bullying and Harassment, Prevention and Safeguarding (identification and prevention of radicalisation or abuse of young workers) and Whistleblowing to allow the safer reporting of any abuses.

Employees are paid into their own bank accounts at no greater intervals than monthly. Contracted agency personnel are paid through vetted employment agencies.

Tamura Europe Limited's compliance with relevant employer obligations, such as regulations governing minimum and living wage, gender pay gap report and pension automatic enrolment duties, serve to underpin the steps the company are taking to ensure modern slavery is not present in the business.

However, the group does recognise that our employees and agents could be subject to outside exploitation which may be difficult to identify. The business is considering measures which may assist with the identifying such risks and we are working on staff education, particular for staff management personnel to provide them with the tools to recognise exploitation and thereafter provide support.

In 2021 the business endeavours to continue with the roll-out of our human rights training program which amongst other topics addresses the issues of modern slavery and human trafficking. Further training with management teams is planned for 2022. As part of increased due diligence efforts, training continues among our global supply chain, so they are better qualified to identify and avoid – and if necessary, mitigate – any violations of policy relating to modern slavery and human trafficking that may be found in our supply chain.

Furthermore, the business endeavours to develop and introduce Key performance indicators to measure the effectiveness of steps being taken by the organisation to ensure compliance to the company's legal obligation.

## **Supply Chain**

Tamura Europe will review and continuously update the qualification process by which a supplier becomes part of Tamura-Europe's supply base. This qualification evaluates the performance of potential suppliers on broad sustainability parameters such as health & safety, environment and working conditions. This process will include a review of supplier performance on issues of modern slavery and human trafficking. In terms of our existing suppliers we have a robust process which seeks to identify suppliers with a higher sustainability risk (which includes the risk of engaging victims of modern slavery and facilitating human trafficking). Then we actively work with such suppliers to mitigate these risks.

Where a potential new supplier fails to meet the Group's policy in relation to Modern Slavery, The Group will not work with these suppliers until they have amended their policies appropriately to meet the Group's standards.

Sustainability in the supply chain is of major importance to Tamura Europe Limited, not least because it enables the company to minimise risks and comply with external requirements. These requirements are defined in the "Supplier code of conduct for suppliers and Third-party intermediaries". Procurement must ensure that suppliers accept the Code of Conduct and do not dissent from it.

## **Our Commitment**

Tamura Europe Limited will not tolerate any violations of applicable law – and if does happen, we will take strong action. We will continue to apply a zero-tolerance approach to forced labour, slavery and human trafficking in any form, in our business and supply chain.

## **Strategic areas of development for the next 12 months**

The Tamura Europe Limited Board are continuously working with senior management to assist in the development of strategies to eradicate improper practices and improvement of the condition of workers within its supply chain. The next stages are as follows: continuously raising awareness of the issues at all levels of the organisation, training key individuals in the business, educating the supply base on the requirements, reviewing the existing policies and guidance for suppliers, developing checklists for visiting staff on welfare, health, safety and conditions, which would provide any early indicators of problems.

In 2022, Tamura Europe Limited has committed to strengthening its review and risk assessment processes for the potential of slavery or human trafficking in the organisation and its supply chain. A more stringent checking and reporting procedure of anti-slavery clauses in its sales and purchase contracts with its customers and suppliers is under development.

During 2021 there were no known reports of the presence or use of modern slavery or human trafficking in Tamura-Europe's supply chain.

**Approval for this statement**

This statement was approved by the Board of Directors with respect to the Financial Year ending on 31<sup>st</sup> December 2021.

Signed

A handwritten signature in black ink, appearing to read 'M. Puliti', written in a cursive style.

Marco Puliti, Managing Director,

**Tamura Europe Limited**