



# TETENAL

## **Tetenal Ltd. Statement on Slavery and Human Trafficking.**

January 2016

### **Introduction**

This statement sets out Tetenal Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2016 to 31 December 2016.

As part of our Photographic Distribution Supply, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Tetenal is committed to maintaining and improving systems and our processes to avoid complicity in human rights violations related to our own operations, our supply chain, and our products.

Tetenal realises that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse.

Therefore throughout this statement, we, Tetenal Ltd. use the terms 'slavery and human trafficking' to encompass all these various forms of coerced labour.

As outlined in greater detail below, we take certain steps during the financial year, to ensure that slavery and human trafficking are not taking place in our supply chains or other parts of our business. To this end, we have established an integrated approach to managing human rights across our business, including risks related to slavery and trafficking.

### **Organisational structure and supply chains**

This statement covers the activities of Tetenal Ltd.:

- Tetenal Ltd. are a Printer, Darkroom and Digital Photography Product Distributor/ Supplier providing hardware, media, chemistry,

consumables, and framing/ gifting products to businesses throughout the UK and Ireland.

### *Countries of operation and supply*

The organisation currently operates in the following countries:

- Tetenal Ltd. trade across the United Kingdom, Ireland and Europe.

The following is the process by which the company assesses whether or not particular activities or countries are a higher risk in relation to slavery or human trafficking:

- Tetenal Ltd. undertake a stringent risk assessment process in relation to our operations in trading in various countries/ locations in reference to slavery and human trafficking, firstly by an initial written questionnaire to be completed by all of our key suppliers, ensuring that they, the supplier, have strong anti-slavery or human trafficking policies in place, and these policies are enforced, and also that they, the supplier (and their manufacturing/ supply chains) are also fully compliant with the Modern Slavery Act of 2015.

### *High-risk activities*

The following activities are considered to be at a higher risk of slavery or human trafficking:

- The key areas of our organisation's activities at a higher risk are the manufacture and production processes for our product lines, much of this is not UK based, with the implication that the labour force used in these manufacturing processes is not fully visible to us, Tetenal Ltd. and so any workforce involved in this manufacturing process could potentially be exploited, or be high risk in relation to slavery or human trafficking, thus failing to meet one or more areas of policy and so not being compliant with the Modern Slavery Act of 2015.

### *Responsibility*

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

- **Policies:** Tetenal Ltd.'s HR Director is responsible for putting in place any anti-slavery initiatives / human trafficking policies. The HR Director also is responsible for the regular review of these policies and the

processes by which they were developed/ are being developed to be within Human Resource guidelines.

- **Risk assessments:** The HR Director has broad organisational responsibility for human rights and modern slavery risk analysis, looking at processes/ ongoing reviews/ regular actions in this area to ensure Tetenal Ltd. are compliant, meeting the requirements of the act.
- **Investigations/due diligence:** The Human Resources department has responsibility to ensure Tetenal Ltd. meet our anti-slavery or human trafficking policies in respect to employment within Tetenal Ltd. The Purchasing Controller is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking, undertaking a review of the suppliers statement of compliance. Steps are taken to verify, evaluate and address risks of slavery of any form in the Tetenal Ltd. supply chain.
- **Training:** Tetenal Ltd. has provided online training resource with [www.eukleia-training.com](http://www.eukleia-training.com). A number of training sessions have taken place directly within the company, and we look to suppliers with a understanding that as part of their ongoing compliance that they also have the required training in place. Our Marketing Dept and digital team have researched this matter extensively to better understand and respond to the identified slavery and human trafficking risks to our business.

## 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 workers, 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 workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report it in a number of ways, either by using the Modern Slavery Website <https://modernslavery.co.uk/report-it.html> or by calling on 0800 0121 700 or by downloading and completing our confidential disclosure form available to download from our [website here](#).
- **Employee code of conduct** The organisation's code outlined in the Tetenal Ltd. employees handbook makes clear to all employees the actions and behaviour expected of them when representing the

organisation. The organisation strives to maintain the highest standards of employee 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 workers 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. We require all chains of supply/ procurement routes to complete a statement of compliance that they meet all points of the Modern Slavery Act 2015.
- **Recruitment of workers policy.** The organisation uses only specified, reputable employment agencies to source our labour and always verifies the practices of any new agency we may wish to work with, before accepting any workers or placing recruitment requirements for employees from that agency.
- **Any other policies relevant to the organisation's business or sector.** Our organisation has a policy, as outlined in our employees handbook, that remuneration is above the minimum wage level. We also ensure all employees have the right to work in the United Kingdom.

## Due diligence

The organisation 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, we undertake a full review of all new suppliers, requiring their written statement of compliance to the Modern Slavery Act of 2015, giving 30 days maximum notice to provide a statement of compliance.
- seeking demonstration of effective modern slavery and human trafficking policies and practices to be in place before beginning trading.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits and assessments through the organisation's own staff, 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 by our Purchasing Controller.
- 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) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring supply chain managers /HR professionals to have completed training on modern slavery by March 2016;
- developing a system for supply chain verification expected to be in place by end December 2015, whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- reviewing our existing supply chains expected to be completed by March 2016, whereby the organisation evaluates all existing suppliers.

## Training

The organisation requires supply chain managers/ HR professionals within the organisation to complete training on modern slavery, delivered as a module within the organisation's wider training programme.

The organisation requires supply chain managers/ HR professionals to complete an online training course by March 2016.

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;

- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "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 the 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 staff, the organisation has raised awareness of modern slavery issues by putting up posters across the organisation's premises and circulating a series of informational emails to staff with links to online resources/ training resources.

The posters and emails explain to Tetenal Ltd.'s staff:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees 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.

### Board approval

This statement has been approved by the organisation's board of directors, who will review and update it annually.



Mike Fawcett  
Managing Director

Date:  
04/02/2016



Mark Norman  
Finance/ HR Director

Date:  
04/02/2016

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