

# UK Modern Slavery Act Statement



For Financial Year ending 30th June 2023

The United Kingdom Modern Slavery Act of 2015 requires certain businesses to provide public disclosures regarding efforts to eradicate slavery and human trafficking from their supply chains and to ensure it is not occurring in its own organisation. This disclosure is intended to provide our customers, suppliers, partners, employees, and the public with information that will allow them to make more informed decisions concerning TRUMPF Ltd (the “**Company**”).

TRUMPF Ltd is the UK sales and service subsidiary of the TRUMPF Group, based in Ditzingen, Germany. The TRUMPF Group is a high-tech company offering manufacturing solutions in the fields of machine tools and laser technology. It drives digital connectivity in the manufacturing through consulting, platform products and software. The TRUMPF Group is one of the technology and market leader in highly versatile machine tools for sheet metal processing and in the field of industrial lasers.

The Company was formed in 1974 and has been operating out of premises in Luton for 30 years, selling and supporting the full range of TRUMPF equipment. It employs around 100 people and its business is at a record level.

In FY 2022/23, TRUMPF Group employed some 17,900 people. With over 90 companies, the TRUMPF Group is represented in nearly every European country as well as in North America, South America and Asia. The company has production facilities in Germany, France, the United Kingdom, Italy, Austria, Switzerland, Poland, the Czech Republic, the United States, Mexico and China.

The Directors recognise that the Company's future success in a highly competitive world depends upon its employees and the development of their skills and abilities. The Company ensures that all its employees, including interns, worldwide are paid at levels above their respective country's national minimum wage.

It is the Company's aim that there shall be equal opportunities throughout the Company including its policies and practices on recruitment, training, promotion, and performance management. There will be no discrimination on the grounds of an employee's sex, gender reassignment, marital status, race (which includes colour, nationality and ethnic or national origins), social origin, political conviction, disability, sexual orientation, religion or belief, or age.

The Company's employee recruitment policy includes provision for disabled employees, providing further necessary training and any reasonable adjustments taking account of their needs. The Company also supports employees who have become disabled during employment with the Company, with the aim to maintain their pre-disability position.

Communication with employees is achieved through regular staff meetings, information bulletins and individually through team meetings and individual performance discussions. The Company also has a policy of consulting with employees about matters that may concern them. In addition, the Company has an intranet that enables its employees ready access to HR policies, handbooks, and health & safety information.

TRUMPF Ltd leads its business with integrity, focused on complying with applicable laws and regulations. We are committed to conducting business with suppliers who support our high standards of ethical conduct. We support the humanitarian goal of eliminating slavery and human trafficking in supply chains and ensuring that it is not present in our own organisation.

The Company strives for exemplary quality in its products and processes – and also in its conduct. The conduct of each employee of the Company has a significant influence on our reputation.

TRUMPF SE + Co. KG (the Company's ultimate parent company) has established a [Compliance Management System](#) that applies to everyone within the TRUMPF Group worldwide and requires

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compliance with the law in all countries in which we operate together with compliance with laws and regulations concerning cross-border trade. As the Management of the Company, we require each and every employee to act in accordance with this [Code of Conduct](#) and the Company's values and ask them to be conscious of the responsibility that they bear for the Company's reputation. This reputation is of immeasurable value to us.

The [Code of Conduct](#) requires that we respect, protect and promote the globally applicable regulations for the protection of human rights, and in particular: the right to equality of opportunity as well as the right to non-discrimination; the prohibition of all forms of child and forced labour; the right to freedom of expression and information, and to form and join professional associations; and the right to health and safety, and to labour and social standards. This applies not only within TRUMPF, but of course also extends to the conduct of and towards our business partners.

The Company has adopted supply chain and quality policies and procedures that support our goals of responsible supply chain management including support of efforts to eradicate slavery and human trafficking from the supply chain.

The Company's major equipment supplier is the TRUMPF Group who are bound by the TRUMPF [Code of Conduct](#) and who perform substantial due diligence on their supply chain.

The TRUMPF Group, evaluates prospective suppliers through a risk-based approach:

- **Verification:** The Group's supplier evaluation includes: condition of facilities and production equipment; employee qualification, product systems, and workplace organisation and safety; quality management and maintenance; supplier management and logistics including quality and supply agreements with their suppliers; innovation capacity and development; strategic alignment and economic stability including revenues per employee; and ethical criteria.

Ethical criteria include: observance of laws; prohibition of corruption and bribes; respect for employee's fundamental rights; prohibition of child labour; employee health & safety; environmental protection with regard to legal and international standards; and observance of ethical criteria in the work place.

- **Audit:** The Group audits suppliers based on a risk-based approach. The audits are not unannounced and are not performed by an independent third party. Visits are arranged in advance, and responses to the supplier evaluation verified.
- **Certification:** The Group's suppliers are required to certify that they do not incorporate conflict materials in their products. The Group's procedures have been updated during the year following the introduction of the EU's regulation on conflict minerals which came into force 1<sup>st</sup> January 2021. Suppliers are also required to certify that they comply with the laws regarding human rights, and in particular the prohibition of all forms of child and forced labour.
- **Internal Accountability:** Notification of violation of company policies and procedures, including the [Code of Conduct](#), is via management or via a confidential email address to an external provider. All such reports of allegations of violations will be promptly investigated and, if the result of the investigation indicates that corrective action is required, the Company will decide what steps to take to rectify any problem and/or avoid the likelihood of its recurrences.
- **Training:** The Company provides training for new and existing employees on its [Code of Conduct](#).

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TRUMPF



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In the financial year ending 30<sup>th</sup> June 2023, TRUMPF SE + Co. KG engaged an independent third-party compliance company to audit the Group's suppliers. The audit focussed on all matters contained with the [TRUMPF Code of Conduct for Suppliers](#), which has been adopted worldwide to assure compliance with the German Act on Corporate Due Diligence Obligations in Supply Chains. The Act includes specific due diligence obligations for the prevention of Human Rights Violations in Supply Chains. The Company will continue to work with its parent company on flowing down these obligations to its suppliers.

The undersigned being all the board of directors of TRUMPF Ltd approved this statement by unanimous consent dated 31<sup>st</sup> July 2023.

LEE MOAKES

TOBIAS BAUR

GERALD JONES

JÜRGEN HERR