

Modern Slavery Statement

Overview

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Tech 21 UK Limited (Tech21) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Tech21 has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

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Our Business

Tech21 is one of the world's fastest-growing technology companies, producing stylish yet protective cases for the latest devices and tablets and has over 100 employees operating globally. Tech21 is a limited company with its head office in Twickenham. Tech21 is a subsidiary of Tech21 Holdings Limited. This statement relates to the UK entity, Tech 21 UK Limited, its structure and supply chain.

Our Policies

Our core values are embedded throughout our business and set the parameters for how we expect people to behave with their colleagues, clients and the world at large. We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

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

1. Anti-slavery policy. This policy sets out Tech21's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. 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.
4. 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.

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Tech 21 UK Limited, Syd's Quay, Eel Pie Island, Twickenham TW1 3DY, United Kingdom
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www.tech21.com



Our Suppliers

Tech21 operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery and on-site audits which include a review of working conditions. Additionally, Tech21 undertakes through an accredited third-party Code of Conduct audits which reviews:

1. Labour Regulations – ensuring there are policies and procedures in place to control: Child labour, forced labour, protection of juvenile workers, apprentices/interns, non-discrimination, no harassment/abuse, working hours, wages and benefits, reward and discipline management;
2. Health and Safety Regulations;
3. Environment Regulations.

Training

We have training in place for our operations teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this Statement

This statement was approved by the Board of Directors of Tech 21 UK Limited.



**Peter Cass, Director
For and on behalf of
Tech 21 UK Limited**

Date: 28 March 2019

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