

Modern Slavery Statement



ORGANISATION

This statement applies to all companies within and associated to TCC Global NV (referred to in this statement as 'The Group'). The information included in the statement refers to the financial year 2016/2017.

ORGANISATIONAL STRUCTURE

TCC Global NV is headquartered in The Netherlands and is controlled by a Board of Directors. The Company operates with employees in 29 countries: Australia, Austria, Belgium, Brazil, China, Croatia, Czech Republic, Denmark, France, Germany, Greece, Hong Kong, Indonesia, Italy, Korea, Latvia, Netherlands, New Zealand, Panama, Poland, Romania, Russia, South Africa, Spain, Switzerland, Taiwan, Thailand, United Kingdom and the USA.

In London and Hong Kong our offices are typically made up of Group employees who support the business operation in our other countries. In these offices, the functions are comprised of: HR, Finance, Marketing, Technology, Sales Teams and Operations. In the United Kingdom, we have only one office which is Heathrow House. Our Chief Executive Officer has control for the United Kingdom.

We are a global loyalty marketing company, developing platforms and campaigns to change the way shoppers think, act and feel about our client's businesses. Our campaigns deliver sustainable, measurable sales growth and enhanced brand equity. We create platforms and campaigns for our clients that involve product or digital rewards, this could include: homewares, leisure and lifestyle and entertainment. Demand for our campaigns is consistently high throughout the year and is therefore not seasonal.

The labour supplied to TCC Global NV in pursuance of its operation is carried out in the locations noted above. In some instances, our employees will travel to the following countries in the course of carrying out their work such as China, Europe, South Asia and Asia-Pacific.

DEFINITIONS

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

COMMITMENT

TCC Global NV acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. TCC Global NV understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

TCC Global NV does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to TCC Global NV in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the

No labour provided to TCC Global NV in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Group strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in: Australia, Austria, Belgium, Brazil, China, Croatia, Czech Republic, Denmark, France, Germany, Greece, Hong Kong, Indonesia, Italy, Korea, Latvia, Netherlands, New Zealand, Panama, Poland, Romania, Russia, South Africa, Spain, Switzerland, Taiwan, Thailand, United Kingdom and the USA.

SUPPLY CHAINS

In order to fulfil its activities, TCC Global NV's main supply chains are extensive and include those related to general merchandises such as toys, dinnerware, knives, cookware, electronics & electrical products, bags & luggage, textiles, glassware and cutlery. Our products supply chains are from various suppliers in China, Europe, South Asia and Asia-Pacific.

We are mainly working directly with our suppliers and developing closer and deeper relationship with them to reduce the risk including human rights risks.

POTENTIAL EXPOSURE

TCC Global NV considers its main exposure to the risk of slavery and human trafficking to be limited. We select our suppliers carefully, aiming to work with partners who can deliver great products while meeting our ethical requirements.

In general, TCC Global NV considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

STEPS

TCC Global NV carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

TCC Global NV has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, TCC Global NV has taken the following steps to ensure that modern slavery is not taking place:

- Our Code of Conduct and international standard as a guideline for our suppliers and factories to comply with the social compliance requirement including forced labour and slavery issues.
- All suppliers and factories are required to sign up the TCC Code of Conduct.
- All the factories are subjected to an ethical audit which is performed by a third party on regular basis.
- Suppliers and factories are required to submit a valid third-party ethical audit report to prove their facility is complied with ETI base code before TCC places any order.

KEY PERFORMANCE INDICATORS

TCC Global NV has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in TCC Global NV or its supply chains.

100% of our suppliers have signed the TCC Code of Conduct and all factories have been independently audited. All the suppliers and factories are registered in our Global Supply Chain & Inventory Management database.

POLICIES

TCC Global NV has the following policies which further define its stance on modern slavery: TCC Supplier Code of Conduct.

The TCC Code of Conduct defines our commitment to human rights and fair labour, these include:

- No use of forced labour
- No use of child labour
- Payment of legal minimum wages
- Freedom of association
- Health and Safety

SLAVERY COMPLIANCE OFFICER

TCC Global NV has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to TCC Global NV obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

This statement was approved by the Executive Committee on 19 December 2017 and was signed by Perry Valkenburg; CEO.

Signed.....

CEO

Date 19/12/17.....