

# **AGAINST MODERN SLAVERY & HUMAN TRAFFICKING PROCESS**

## **1. Introduction**

Indochine Engineering (ICE) establishes this process to:

- Promote ethical and responsible business practices by establishing standards to prevent modern slavery and human trafficking in ICE's operations.
- Help ICE meet international legal obligations, commitments to its customers, and best practices related to prevention of modern slavery and human trafficking, including, but not limited to:
  - The California Transparency in Supply Chains Act ([http://www.leginfo.ca.gov/pub/09-10/bill/sen/sb\\_0651-0700/sb\\_657\\_bill\\_20100930\\_chaptered.pdf](http://www.leginfo.ca.gov/pub/09-10/bill/sen/sb_0651-0700/sb_657_bill_20100930_chaptered.pdf))
  - United Kingdom Modern Slavery Act (2015) (<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted> )
  - United Nations Guiding Principles on Business and Human Trafficking ([http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf) )
  - Australian Federal Modern Slavery Act 2018 & New South Wales Modern Slavery Act 2018 (<https://www.legislation.gov.au/Details/C2018A00153> ) and (<https://www.legislation.nsw.gov.au/#/view/act/2018/30>)

## **2. Scope of application & eligibility**

All employees sign the labor contract with Indochine Engineering, referenced through this process as “ Employees”.

All suppliers, vendors, and other third parties engaged in providing the goods or services to ICE, referenced through this process as “ Suppliers”.

## **3. Principles**

ICE is committed to operating our business with integrity and respect for human rights. We prohibit any form of exploitation, including child labor, forced labor, and human trafficking. We pay fair wages and hours, and we support the right of Employees to freely associate with trade unions.

ICE will not tolerate the use of forced labour, child labour, or human trafficking by any employee or Supplier in the operation or support of our business or the manufacture and distribution of our products. No Employees and Suppliers will:

- Participate, directly or indirectly, in any form of the trading or coerced transport of people for the purpose of exploitation.
- Engage in or promote or assist in the sexual exploitation of others.
- Use forced or involuntary labour in the performance of any work.

- Retain an individual identity or immigration documents and deny access by that individual to these documents.

#### 4. Violation Reporting

To ensure a safe and ethical workplace, we encourage all Employees and Suppliers to report any concerns related to anti-slavery or human trafficking.

Your report will be kept strictly confidential, and you will not face any retaliation for coming forward. Please send your report to [tokyu-cnst\\_help@nishimura.com](mailto:tokyu-cnst_help@nishimura.com).

#### 5. Consequences of non-compliance

- *Non-cooperation with investigations:* Any employee who obstructs an audit or investigation related to this process, such as hiding or destroying evidence or providing false information, may face disciplinary action, including termination.
- *Process violations:* Failure to comply with this process constitutes a breach of the employment agreement and may result in disciplinary action, up to and including termination.
- *Reporting violations:* Employees and suppliers who fail to report suspected or actual violations of this process may be subject to disciplinary action.
- *Supplier compliance:* Compliance with this process is mandatory for all ICE suppliers. Any supplier found to be involved in modern slavery or human trafficking will have their agreement terminated.
- *Legal consequences:* Violators may also face civil and criminal penalties.

#### 6. Red Flags and indicators of worker faced, human trafficking and modern slavery

The following indicators can help identify potential cases of forced labor and human trafficking in ICE or supplier operations:

##### 6.1 Work and Living Conditions:

- Not free to leave or come and go as he/she wishes
- Is unpaid, paid very little, or paid only through tips
- Works excessively long and/or unusual hours
- Is not allowed breaks or suffers under unusual restrictions at work
- Owes a large debt and appears unable to pay it off
- Was recruited through false promises related to work
- High security measures are in place where none should be required (e.g., opaque or boarded-up windows, bars on windows, barbed wire, etc.)
- Working hour data does not match worker accountings

##### 6.2 Poor Health or Abnormal Worker Behaviour:

- Appear fearful, anxious, depressed, submissive, tense, or paranoid
- Exhibits unusual behavior if topic of law enforcement is raised
- Avoids eye contact, even when requested
- Lacks medical care and/or has been denied medical services by employer
- Appears malnourished or shows signs of exposure to harmful chemicals

- Shows signs of physical and/or sexual abuse, restraint, confinement, or torture
- No sense of time – cannot identify what day it is

### **6.3 Lack of Control:**

- Has few or no personal possessions or all possessions appear to be in workplace
- Is not in control of his/her own money, no financial records, or bank account
- Is not in control of his/her own identification documents (ID or passport)
- Not permitted to speak for himself/herself (third party insists on being present to translate)
- Claims he/she is just visiting and cannot clarify a residential address
- Lack of knowledge of where he/she is.