

Document Name: CT-UK-072 Slavery and Human Trafficking Policy

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Document History

Date	Author	Revision	Description of Change(s)
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09/01/2017	Mark Walker	02	Document review
19/01/2017	Emma Rooke	03	Document amendments to include sale and exploitation of children
03/01/2018	Mark Walker	04	Signed by Ian Holt

1. Ctrack slavery and human trafficking Policy Statement

It the policy of Ctrack UK Ltd to conduct all of its business in an honest, transparent and ethical manner. We take a zero-tolerance approach to modern slavery and human trafficking within Ctrack and its supply chains and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

2. Introduction

There are tens of millions of people trapped in various forms of slavery throughout the world today. Researchers estimate that 21 million are enslaved worldwide, generating in excess of £120 billion each year in illicit profits for traffickers. Common forms of modern slavery include:

2.1. The sale and exploitation of children

The sale and exploitation of children involves situations where children are transferred by one person to another for remuneration, or other consideration. Examples include unlicensed gold mining activities where children can easily access narrow tunnels and shafts.

2.2. Human trafficking

Human trafficking, believed to be the third-largest criminal activity in the world, is a form of human slavery which must be addressed at the interagency level. Human trafficking includes forced labour, domestic servitude, and commercial sex trafficking.

2.3. Forced labour

Forced labour is any work or services that people are forced to do against their will under the threat of some form punishment. Almost all slavery practices, including trafficking in people and bonded labour, contain some element of forced labour.

3. Steps for the prevention of modern slavery

The Company is committed to ensuring there is transparency in its own business and in our approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015. The Company expects the same high standards from contractors, suppliers and business partners. The Company expects its suppliers to hold their own suppliers to the same high standards.

All employees have an obligation to familiarise themselves with the companies procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented.

Whilst recognising the Company's statutory obligation to set out the steps it has taken to ensure that modern slavery and human trafficking is not taking place in supply chains, the Company acknowledges that it does not control the conduct of individuals and organisations in supply chains. To underpin its compliance with practical steps, the Company intends to implement the following measures:

3.1. Risk assessments

Risk assessments will be undertaken to determine which parts of the business and which of the Company’s suppliers are most at risk of modern slavery so that efforts can be focussed on those areas.

3.2. Company’s suppliers

Engagement with the Company’s suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses.

3.3. Supplier pre-screening

Where appropriate, as informed by the Company’s risk assessment, seek to introduce further supplier pre-screening and self-reporting for our suppliers on safeguarding controls;

4. Due Diligence

As part of Ctrack’s due diligence processes into slavery and human trafficking, the supplier approval process incorporates a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues, therefore the level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking. The company Directors and Senior Management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

This policy takes into account and supports the policies, procedures and requirements documented in the Ctrack Management System. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

To ensure this policy is kept up to date and relevant Ctrack will review the policy annually or more frequently if circumstances dictate otherwise.

Signed:



Date: 03 January 2018

Ian Holt

Finance and Operations Managing Director