

### MODERN DAY SLAVERY ACT 2015

### ANTI SLAVERY AND HUMAN TRAFFICKING POLICY

Version 1.1 - September 2017

#### Policy Statement

Modern slavery is a crime<sup>1</sup> and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which deprive a person of their liberty in order to exploit them for personal or commercial gain.

Tracsis has a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. We have adopted and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business. We are also committed to ensuring transparency in our business and in our approach to tackling modern slavery, which is consistent with our disclosure obligations<sup>2</sup> under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and business partners, this will be monitored through the existing supply chain management process.

This policy applies to all persons working for Tracsis and Data Services or on our behalf in any capacity, including employees at all levels, Directors, agency workers, contractors, external consultants, third-party representatives and business partners. This policy forms part of any employee's conditions of employment and we reserve the right to amend it at any time.

#### Responsibility

- The Divisional Managing Director holds overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all employees comply with it.
- Chief Operating Officers<sup>3</sup> (COOs) are responsible for the day-to-day implementation of this policy, monitoring its use and effectiveness and auditing internal control procedures to ensure they are effective in countering modern slavery. They are also responsible for nominating subordinate managers who, in their view, need to be aware of this policy.
- Nominated Managers are responsible for ensuring that they read, understand and comply with this policy. If they are in any doubt, guidance is to be sought from COOs.
- All managers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be raised via COOs.

#### Compliance

- Guidance for Nominated Managers:
  - The prevention, detection and reporting of modern slavery in any part of our business or supply chains should be of concern to all staff, and in particular Managers, who are required to avoid any activity that might lead to, or suggest a breach of this policy.

<sup>1</sup> Modern Slavery Act 2015 - <http://www.legislation.gov.uk/ukpga/2015/30/part/1>

<sup>2</sup> <http://www.legislation.gov.uk/ukpga/2015/30/section/54>

<sup>3</sup> For Tracsis Traffic Data Ltd, SEP Events Ltd and Traffic Passenger Counts Ltd.

- You are encouraged to raise concerns about any issue or suspicion of modern slavery, encountered in any part of our business or supply chains at the earliest opportunity.
- If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify any of the Company COOs without delay.
- If you are unsure about whether a particular act or incident within the company or supply chain constitutes modern slavery, you should report the incident regardless of any uncertainty you hold.
- The Company will encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.
- If a company employee believes that they have received inappropriate treatment after raising a concern under this policy, they should inform their line manager and if necessary resort to the Grievance Procedure detailed in the Company's Employee Handbook.

### **Communication and Awareness**

Managers are to be trained on the content of this policy. COOs are to lead on implementation of that training in conjunction with the HSEQ Manager.

A copy of the Modern Slavery Act 2015 is accessible electronically, from here: <http://www.legislation.gov.uk/ukpga/2015/30/contents>

In accordance with Clause 54(7) of the Modern Slavery Act 2015, a copy of this policy is published on the Tracsis Traffic Data Ltd website, and can be viewed here: <https://tracsistraffic.com/our-business/>

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breaches of Policy**

Any employee who breaches this policy may face internal disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### **Audit and Review.**

This policy statement will be reviewed annually, in line with the financial year, updated as necessary and re-published accordingly.

Signed:



Alex Johnson  
Divisional Managing Director

Date: 25<sup>th</sup> September 2017