

# MODERN SLAVERY



## Policy Statement

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This policy sets out the approach of Coretrax, with the aim of the prevention of opportunities for modern slavery to occur within its business and to conduct due diligence to help prevent it within its supply chain. The policy’s use of the term “modern slavery” has the meaning given in the Act.

Coretrax has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers, consistent with its obligations under the Modern Slavery Act 2015.

This policy applies to all individuals working for the Company or on the Company’s behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

## Steps for the Prevention of Modern Slavery

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. The Company also expects the same high standards from all its suppliers, contractors and other business partners, and as part of its contracting processes, it includes specific prohibitions against the use of modern slavery and expects that its suppliers will in turn hold their own suppliers to the same standards.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications. Whilst recognising our statutory obligation to set out the steps we take to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we implement the following measures:

- a) engage with our suppliers both to convey to them our Modern Slavery and Human Trafficking Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their business and their supply chain.
- b) supplier pre-screening and self-reporting for our suppliers on safeguarding controls that they have in place; and

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- c) contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

## Responsibility for the Policy

Ultimate responsibility for the prevention of modern slavery rests with the Company's Executive Team. The Executive Team has overall responsibility for ensure this policy and its implementation comply with our legal and ethical obligations.

Managers are responsible for ensure those reporting to them understand and comply with this policy and are made aware of the issue of modern slavery and where this might occur.

All employees are responsible for complying with and reporting any suspected breaches of this policy.

## Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether an act, and/or the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager.

The Company aims to 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 or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

External Members of the public or people not employed by the Company are encouraged to write, in confidence, to the Group Compliance Office via email to [Ethics.Integrity.Line@coretrax.com](mailto:Ethics.Integrity.Line@coretrax.com) to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

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## Training and Communication

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering new or renewed contracts with them and reinforced as appropriate thereafter.

## Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

If an issue is identified with a supplier, where possible, we shall work with them to prepare a corrective action plan and resolve all violations within an agreed time.


The Company reserves the right to terminate its commercial relationship with suppliers, contractors, and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

## Review

This Modern Slavery and Human Trafficking policy will be reviewed on a regular basis, at least annually and may be amended from time to time.

## Approval

This statement has been approved by the board of directors on the 15/04/2021

This statement has been signed off by: 

Director Name: John Fraser

Job Title: Group CEO

Date: 17.01.2023