



**Modern Slavery Act 2015**  
***Transparency Statement***  
***April 2016 to March 2017***



a TRAC company

**TRAC International Ltd**  
**and Subsidiary Companies**

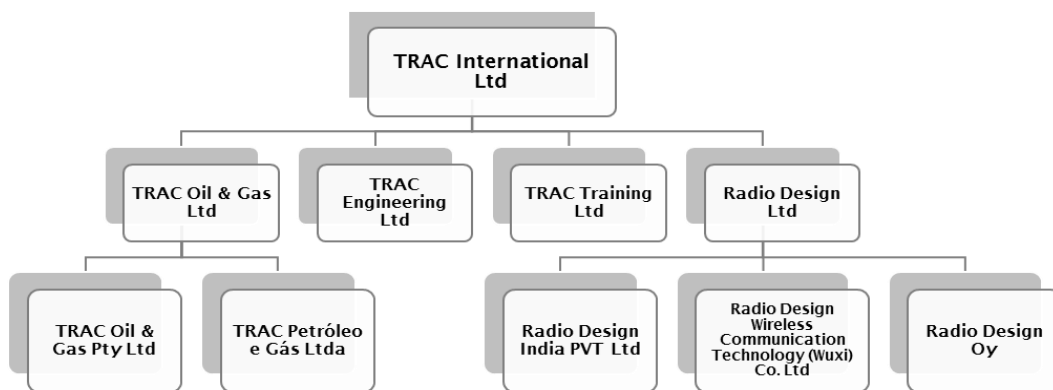
# ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT



## 1.0 PURPOSE

The following statement defines the strategies employed by TRAC International Ltd and subsidiary companies (TRAC) to prevent modern slavery from occurring in our supply chain and organisations.

## 2.0 ORGANISATION



The TRAC International Group provides first class products and services operating worldwide.

We aim to provide a wholly focused, dedicated and thorough service to our customers; one that meets their requirements and exceeds expectation.

## 3.0 SCOPE OF ACTIVITIES

COMPANY	SCOPE
TRAC International Ltd	Provision of corporate business support and management systems and services.
TRAC Oil and Gas Ltd TRAC Oil and Gas PTY Ltd TRAC Petróleo e Gás Ltda	Provision of engineering, installations, inspection, repair and maintenance services for the Oil & Gas and Marine Industries. Services include mechanical, rigging, NDT, electrical, fabric maintenance, painting and access solutions.
TRAC Engineering Ltd	Provision of engineering, construction, inspection and maintenance support services to civil engineering; rail network infrastructure; power utilities; renewable energy; broadcasting and telecommunication industries. Services include earthworks, geotechnical steelwork, mechanical, rigging, NDT, electrical, fabric maintenance, painting, access solutions and provision of associated plant and equipment.
TRAC Training Ltd	Provision of Training Services including specialist access, work

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COMPANY	SCOPE
	at height, rail safety and site safety.
Radio Design Ltd	Provision of design, product development and manufacturing for the wireless infrastructure market. Provision of hardware repair services.
Radio Design India PVT. Ltd	Provision of hardware repair services to the wireless infrastructure industry.
Radio Design Wireless Communication Technology (Wuxi) Co. Ltd	
Radio Design OY	Project support for provision of hardware repair services to the wireless infrastructure industry.

## 4.0 TRANSPARENCY IN SUPPLY CHAINS

Whilst a diverse group, with distinct supply chains unique to each company, TRAC collectively recognise that modern slavery is a crime resulting in an abhorrent abuse of human rights.

TRAC proactively aim to promote ethical business practices and policies that protect workers from being abused and exploited. Specifically, throughout the April 2015 to March 2016 financial year, TRAC took the following measures to ensure:

- A transparent supply chain in compliance with Section 54, the Modern Slavery Act 2015.
- That Group operations and their associated supply chains are free from involvement with slavery or human trafficking.

## 4.1 Risk Management

In accordance with TRACPROC C12 – Risk Analysis and Risk Management Procedure, TRAC methodically assessed all business risks related to our activities. This helped to direct strategic decision(s) and facilitate sustainability over the financial year, enabling TRAC to deliver to the highest standard possible.

The types of risks that were assessed included:

- Strategic – competition; customer changes; industry changes; customer demand; R&D; intellectual capital etc.
- Compliance – with legislation, standards etc.
- Financial – interest rates; foreign exchange; credit; liquidity/cash flow etc.
- Operational – culture; recruitment; supply chain; information systems; accounting controls; system malfunction; loss of key staff etc.

This process allowed TRAC to identify any areas of high risk (such as those in our supply chain) and put in place risk management strategies proportionate to the identified risk. We continued to recognise that this is an essential process when investigating the potential to enter a new market or launch a new product or service.

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## 4.2 Ensured the Continuing Suitability of HSEQ Management System

TRAC operate to an integrated management system designed in accordance with ISO 9001, ISO 14001 and OHSAS 18001 and addressed all clauses of these standards without any exclusions:

- All company activities were planned to ensure they were carried out effectively and efficiently, while complying with company policies.
- Implementation of planned activities was done in accordance with relevant procedures, standards, legislation etc.
- Key activities were monitored and evaluated to identify good practice and scope for improvement.
- Feedback from all activities was reviewed by Senior Management with actions identified to improve company performance.

TRAC Senior Management actively supported the continual improvement of the HSEQ system to ensure its continuing suitability, adequacy, effectiveness and alignment with the strategic direction of the organisation.

## 4.3 HR and Employment Processes

TRAC are committed to compliance with the applicable legislation for all areas in which we operate. To assist with this, rigorous HR and recruitment processes are in place (supported by TRACPOL C03 – HR Policy) to ensure qualification and entitlement of persons to work in both the United Kingdom and all other countries that we operate. TRAC employ competent HR Advisors and appoint external legal consultants to interpret and advise on employment law and ensure adherence to these standards.

TRAC remained committed to ensuring that we provide a desirable place to work, where personnel feel valued and supported in their roles. We aim to employ and retain staff of ability and integrity, who are committed to working together and supporting our principles. Any concerns about slavery or human trafficking can be raised with Line Managers for appropriate action.

## 4.4 Approved Vendors

TRAC will not knowingly award business to socially or environmentally irresponsible suppliers. To ensure this, TRAC have in place a robust Vendor Approval processes that includes an assessment of a supplier's corporate social responsibility and ethics.

This process was subject to audit and review over the year to ensure that the vendors we utilised conformed to the standard expected by us. Key suppliers were subject to onsite audits where deemed appropriate.

Radio Design – who operate in and are supplied by specific countries worldwide where risk is particularly acute – ensure a particularly rigorous schedule of supplier audits to verify working conditions and that no forced or child labour within the supply chain.

The companies within the TRAC Group continued to work closely with the Client's that we supply to, verifying our ability to ensure a transparent supply chain. This included signing up to Client sponsored platforms for assessment as required.

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## 4.5 Due Diligence – Conflict-free Minerals (Radio Design only)

As per Risk Management processes, TRAC have specifically identified the potential risk of conflict minerals in regards to Radio Design's supply chain. We remain committed to ensuring due diligence in procuring conflict-free minerals. Radio Design have processes implemented that ensure our suppliers adhere to these standards to help achieve a conflict-free supply chain.

Printed Circuit Board (PCB) supplier processes were subject to review by the Quality Management Team, with the guidance and technical input of the Quality Manager.

TRACINFO C04.11 – Code of Conduct sets out the minimum standards that Radio Design expect our suppliers to adhere to including child/forced/compulsory labour. All suppliers are required to fill out TRACFORM RD 13.04 – Radio Design HSEQ Questionnaire detailing their Corporate Social Responsibility policies in addition to question on ethics, employment conditions and labour laws (included forced/bonded labour).

## 5.0 POLICY STATEMENT

TRAC have proactively taken steps to implement due diligence measures by integrating the issue of modern slavery into our HSEQ (and associated supply chain) management systems and company risk management processes as outlined above.

We are committed to the:

- Maintenance of existing internal controls to address the issue of modern slavery.
- Continual improvement of our systems by expanding upon control measure as new opportunities and risks in relation to this issue are identified.

**For and on behalf of TRAC International and Subsidiary Companies:**

**Managing Director: K Stephen**

**Signature:**

**Date: 21<sup>st</sup> April 2017**