

MODERN SLAVERY



DOING THE RIGHT THING -TOGETHER

Acting responsibly, with integrity in all of our practises and relationships, is how we do business. In line with this commitment, Traffix operates a zero tolerance approach to modern slavery.

To support our position, the systems and processes we have implemented ensure that at all times we uphold the highest ethical standards. As a result, we are confident that the risk of modern slavery within Traffix is remote. However, we recognise the potential of modern slavery with partner organisations. We actively collaborate and support our supply chain partners, whilst making our position clear.

Addressing modern slavery requires urgent action. Together with our partners, we remain resolute in the pursuit of a future where fairness and respect prevail.

Stuart Morrissey

Managing Director

ANTI SLAVERY POLICY



Procedure No: TFX/106/IMS/POL/CH

Document name: Modern Slavery and Human tra

MD Approved:

DIFFERENTIATORS

At Traffix UK, we are committed to maintaining the highest ethical standards in all our business operations. We recognize our responsibility to combat modern slavery and human trafficking and are dedicated to ensuring that these practices do not exist within our operations or supply chains. This policy outlines our commitment to preventing modern slavery and human trafficking in compliance with the Modern Slavery Act 2015.

This policy applies to all employees, contractors, suppliers, and business partners of Traffix UK. It covers all aspects of our operations, including recruitment, procurement, and service delivery.

DEFINITIONS

Modern Slavery: Encompasses slavery, servitude, forced and compulsory labour, and human trafficking.

Human Trafficking: Involves the recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat, use of force, coercion, abduction, fraud, deception, abuse of power, or vulnerability.





	Date: August 24 Available Date: August 2024 Review Date: August 2025
	Issue: 005/CH
afficking	QHSE Approved
	Status: Released



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OUR COMMITMENTS

Our Commitment: We are truly committed to actively preventing and addressing any instances of modern slavery and human trafficking within our organisation and across our supply chains.

Compliance: Ensure compliance with all relevant legislation, including the Modern Slavery Act 2015.

Training: Provide training to employees to raise awareness of modern slavery and human trafficking and how to report concerns.

Due Diligence: Conduct thorough due diligence on suppliers and contractors to ensure they share our commitment to eradicating modern slavery.

Reporting and Transparency: Maintain transparent reporting mechanisms and encourage employees and partners to report any concerns regarding modern slavery.

RISK ASSESSMENT AND MANAGEMENT

Risk Identification: Identify and assess potential areas of risk within our operations and supply chains.

Mitigation: Implement measures to mitigate identified risks, including vetting suppliers and conducting regular audits.

Continuous Improvement: Regularly review and improve our policies and procedures to address any new risks or challenges.

SUPPLIER ENGAGEMENT

Supplier Code of Conduct: Require all suppliers to adhere to our Supplier Code of Conduct, which includes strict prohibitions against modern slavery.

Contracts and Agreements: Incorporate anti-slavery clauses in all contracts and agreements with suppliers and partners.

Monitoring and Audits: Conduct regular audits of suppliers to ensure compliance with our anti-slavery policy.

REPORTING AND WHISTLEBLOWING

Reporting Mechanisms: Establish and promote clear reporting mechanisms for employees and partners to report any concerns related to modern slavery.

Protection: Ensure that all reports are handled confidentially and that whistleblowers are protected from retaliation.

ACCOUNTABILITY AND GOVERNANCE

Senior Leadership Oversight: Assign responsibility for overseeing the implementation and enforcement of this policy to a designated member of the senior leadership team.

Regular Reviews: Conduct regular reviews of this policy to ensure its effectiveness and make necessary adjustments.

Traffix UK is fully committed to preventing modern slavery and human trafficking in all its forms. We will continue to uphold our ethical standards and work diligently to ensure that our operations and supply chains are free from these practices. This policy will be communicated to all employees, suppliers, and business partners and will be reviewed annually to ensure its ongoing relevance and effectiveness.

For any concerns or further information regarding this policy, please contact Kerry Draper, Director of Health & Safety.





WHISTLEBLOWING POLICY

WHISTLEBLOWING POLICY ON MODERN SLAVERY AND HUMAN TRAFFICKING

POLICY STATEMENT

Traffix UK is committed to the highest standards of ethics and integrity in all our business practices. We recognize that modern slavery and human trafficking are serious violations of human rights and are committed to preventing these practices within our operations and supply chains. To support this commitment, we have established a whistleblowing policy that provides a safe and confidential process for employees to report any concerns regarding modern slavery and human trafficking.

SCOPE

This policy applies to all employees, contractors, suppliers, and any other individuals associated with Traffix UK.

PURPOSE

The purpose of this policy is to:

- Encourage the reporting of genuine concerns regarding modern slavery and human trafficking.
- Provide a clear and accessible process for reporting such concerns.
- Ensure that reports are handled confidentially and investigated promptly.
- Protect whistleblowers from retaliation or victimization.

REPORTING MECHANISMS

Employees and other individuals can report concerns about modern slavery and human trafficking through the following mechanisms:

Whistleblowing Hotline:

- A dedicated, confidential hotline is available 24/7.
- The hotline number is 0800 819 9001 (24hrs).
- Reports can be made anonymously if preferred.

Email:

- Concerns can be reported via email to Kerry.draper@traffixuk.com
- Emails will be handled with the utmost confidentiality.

Whistleblowing Portal:

- An online reporting portal is available on our company intranet
- The portal allows for anonymous reporting and provides guidance on how to submit a report.

Direct Reporting:

Concerns can also be reported directly to the designated Whistleblowing Director, Kerry Draper at Kerry.draper@traffixuk.com or HR Manager at HR@traffixuk.com

PROCEDURE

Submission of Report:

- The whistleblower submits their concern using one of the reporting mechanisms listed above.
- The report should include as much detail as possible, including names, dates, locations, and any supporting evidence.

Acknowledgement:

Upon receipt of a report, the Whistleblowing Director / Officer will acknowledge receipt within 5 business days.

Initial Assessment:

The Whistleblowing Officer will conduct an initial assessment to

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determine the validity of the report and the appropriate course of action.



Investigation:

- If the report is deemed credible, a formal investigation will be initiated.
- The investigation will be conducted confidentially and may involve interviews, document reviews, and coordination with relevant departments.

Outcome and Feedback:

- The whistleblower will be informed of the outcome of the investigation, provided it does not compromise confidentiality or legal obligations.
- Appropriate corrective actions will be taken based on the findings.

Protection and Support:

- Whistleblowers will be protected from retaliation or victimization.
- Any employee who retaliates against a whistleblower will face disciplinary action, up to and including termination.
- Support services, such as counseling, may be offered to whistleblowers if needed.

CONFIDENTIALITY

All reports will be treated with the highest level of confidentiality. Information will only be shared on a need-to-know basis to facilitate a thorough investigation. The identity of the whistleblower will be protected to the extent possible, consistent with the need to conduct a proper investigation.

REVIEW AND MONITORING

This policy will be reviewed annually to ensure its effectiveness. The Whistleblowing Director / Officer will maintain a record of all reports and investigations, and a summary will be presented to the board of directors.

CONTACT INFORMATION

For any questions or further information regarding this policy, please contact the Whistleblowing Director / Officer at kerry.draper@traffixuk.com.

Traffix UK is dedicated to fostering a safe and ethical work environment. By implementing this whistleblowing policy, we aim to empower our employees and partners to take an active role in preventing modern slavery and human trafficking.





CONTACT

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