

# TRACTO

## Modern Slavery & Trafficking Policy

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Review Date: June 2024

TRACTO-TECHNIK UK Limited  
10 Windsor Road  
Bedford  
MK42 9SU

Tel: 01234 342566



Modern slavery is a crime 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 have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. TRACTO-TECHNIK UK have a zero-tolerance approach to modern slavery and 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 business or in any of our supply chains.

We are also 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. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### **Responsibility for the policy**

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Company Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Line Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

### **Compliance with the policy**

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

We aim 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. We are



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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

### **Communication and review of this policy**

TRACTO-TECHNIK UK's 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. A full copy of this policy will be accessible to all employees electronically and can be accessed in paper form too in the Kitchen and the Workshop Kitchen. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is annually reviewed by the Managing Director to ensure its continuing suitability and relevance to the company activities.

### **Concerns**

If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the Modern Slavery Helpline 08000 121 700. For more information visit [www.unseenuk.org](http://www.unseenuk.org)  
Alternatively you can make calls anonymously to Crimestoppers on 0800 555 111.

### **Breaches of this policy**

Any employee who breaches this policy will face 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.

### **Contractual status of this policy**

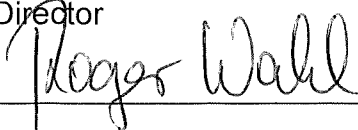
This policy does not form part of your contract of employment. The company has the right to amend this policy at any time. It will communicate any material changes to employees.

### **Ownership, updates and queries**

The policy is owned by the Managing Director and Company Secretary of TRACTO-TECHNIK UK.

Any questions on the application of the policy should be directed to the Training Manager.

Roger Wahl  
Managing Director

Signed:  Date: 09/06/2023

Cheryl Birkbeck  
Company Secretary

Signed:  Date: 09/06/2023



