

The Company	PTC Ltd
Policy Number	2
Policy Title	Anti-slavery
Version	A
Issue date	
Review Period	2 years
Date of Next Review	
Responsible Person (where required)	M Pleydell
Role of Responsible Person	Director

1. Introduction

- 1.1. The Company values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the staff and contractors of the Company as well as others acting on the Company's behalf are key to maintaining these standards.
- 1.2. The purpose of this document is to set out the Company's policy in relation to modern slavery. The policy applies strictly to all staff and contractors working for the Company.

2. Modern Slavery

- 2.1. This policy is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Company has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.
- 2.2. Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different 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.

3. Company Policy

- 3.1. The Company has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business.

4. Breach of Policy

- 4.1. The Company may terminate its commercial relationship with any party if they breach this policy and/or are found to have been involved in modern slavery.
- 4.2. The company will require evidence of anti slavery policies from its supply chain to satisfy itself in respect of anti slavery under its due diligence and quality management processes

5. Staff responsibility and how to raise a concern

- 5.1. The prevention, detection and reporting of modern slavery is the responsibility of all staff. If, in the performance of your duties you become aware or suspect that an element of modern slavery is proposed or has taken place, then you have a duty to report this to the police and if it relates to the Company's business you should also report it to the responsible person at the Company.
- 5.2. The responsible person for Company's anti-slavery policy is the Director.