

SWARCO

Anti Modern Slavery & Human Trafficking Policy

SGUK-HR-POL-002



Revision History

Rev	Revision detail	Date
1	New Document First Issue	December 2020
2	Annual Review	July 2020
3	Annual Review	July 2021
4	Annual Review Updated section 1 to include SWARCO UK & Ireland Ltd	July 2022

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ANTI MODERN SLAVERY & HUMAN TRAFFICKING

1 Introduction

This policy applies to the SWARCO Group of companies based in the UK; SWARCO UK Ltd, SWARCO UK & Ireland Ltd, SWARCO TRAFFIC Ltd and APT Skidata Ltd, collectively referred to hereafter as “The Company”.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the 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 Organisational Structure

The Company carry out a range of services in the traffic management, parking and eMobility areas, across a number of market sectors in the UK.

The Company in the UK are part of SWARCO AG, an Austrian Registered Company and SWARCO AG is the ultimate Parent Company.

2.1 Our Business

Our Business is organised into 4 business units:

- SWARCO UK Ltd
- SWARCO Traffic Ltd
- SWARCO UK & Ireland Ltd
- APT Skidata Ltd, a JV Company

The 4 business units share central support with regards to Human Resources, Quality, Health, Safety and Compliance, IT, Marketing and in some cases Finance.

2.2 Our Supply Chains

All procurement of services and supply is undertaken by specific people within our 4 business units. The Company aim to build long term sustainable relationships with strategic suppliers, encouraging collaborative working and exchange of innovative and good industry practices.

The Company procure from well-established and recognised Companies in the UK, Austria, Spain, Germany and Denmark.

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3 Due Diligence Processes for Anti Modern Slavery & Human Trafficking

The Company have carried out a risk-based analysis with regards to Slavery and Human Trafficking on our own operations and within our supply chain, having special regard for the locations of those operations and types of service.

The Company have put in place a system to:

- Evaluate new suppliers as part of the tendering process
- Identify and assess potential risk areas in our supply chains
- Monitor potential risk areas in our supply chains on a regular basis

The Company shall conduct an annual audit of our supply chain to assess their compliance to the Act, raise awareness as well as evaluate the suppliers we use with an annual turnover of more than £36m, and ensure they have a Slavery and Human Trafficking statement and policies in place themselves.

4 Our Policy on Modern Slavery & Human Trafficking

The Company have a zero-tolerance policy towards Modern Slavery and are committed to ensuring that there is no Modern Slavery or Human Trafficking in our supply chains or in any part of our business.

Modern Slavery is a violation of human rights and takes various forms such as slavery, forced and compulsory labour, child labour, exploitation and having restrictions on freedom of movement ensuring personal or commercial gain.

The Company expect all parts of the business, along with contractors and suppliers, to act in an ethical manner and to consistently work within the standards set under the Modern Slavery Act 2015. We include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect our suppliers and contractors to hold their own suppliers to the same standards.

This policy applies to all persons working for the Company in any capacity, including but not limited to directors, employees, agency works, interns, contractors, third party representatives, suppliers and business partners. This policy does not form part of any employee's contract of employment and we may amend it at any time.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-Modern Slavery Policy. This Policy sets out the organisation's stance on Modern Slavery and where to report any concerns. Our online specialist training conducted via Human Focus covers how to identify instances of modern slavery.
- Recruitment Policy. We undertake pre-employment screening that includes identity checks and confirmation of entitlement to work in the UK, on all employees prior to

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commencing employment with us. On joining, each employee attends a comprehensive induction which covers the essential information in relation to policies and procedures and matters such as whistleblowing.

- Whistleblowing Policy. We operate a Whistleblowing Policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- Code of Conduct. This Code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
- Grievance Policy. The Company have an effective Grievance process in place to cover any concerns within the business.

All employees are requested to read and accept the above Company's Policies as part of our Induction Procedure.

5 Responsibility for the Statement

The Board of Directors for the Company in the UK have ultimate responsibility for ensuring this statement complies with their obligations.

The Group Head of HR/Managing Directors have responsibility for ensuring that the Anti-Slavery Policy is implemented and audited on a regular basis, to ensure its effectiveness both internally and externally.

All employees are responsible for ensuring that they understand and comply with this statement, and are required to avoid any activity that might lead to a breach of our Policy and the Modern Slavery Act 2015.

6 Communication & Training of the Statement

Communication of this policy will form part of the induction process for all individuals who work for the business and our suppliers. In addition, the Company now provides on-line specialist training via Access Group for all employees to complete as part of the Company's induction programme. This includes a centralized dashboard to provide visibility to our HR and Compliance Departments for employee training completion.

7 Monitoring & Quality Assurance

The actions above are a continuous process and following review of the effectiveness of these measures, will be further developed and the regime of internal and external audits will be stepped up to maintain compliance, and to ensure that the initiative remains focussed.

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8 Reporting Concerns

The Company encourages employees 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.

Where an employee believes or suspects a breach of this policy has occurred or that it may occur, they must inform the Head of Human Resources or report it in accordance with the Whistleblowing Policy as soon as possible.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must raise it with the Head of Human Resources.

9 Key Performance Indicators

Our measures to combat Modern Slavery are in constant review, and the pro-active regime of training and internal and external audits shall continue and will be stepped up to maintain compliance.

Our main KPI is the number of incidents raised. During 2021 no incidents on Modern Slavery were raised throughout any of the channels provided.

This policy will be reviewed annually by the Group Head of HR to assess its implementation and effectiveness. This is in line with statutory requirements.

Signature: 
Position: Head of Human Resources
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Review Date: 8th July 2023

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