

## Modern Slavery and Human Trafficking Statement

### Modern Slavery Act 2015

#### 1. Introduction

This statement is made on behalf of Teletrac Navman (UK) Limited (“**Teletrac Navman**”), and Trafficmaster Traffic Services Limited (“**Trafficmaster**”) and is issued pursuant to our obligations under the UK’s Modern Slavery Act 2015 (“**MSA**”). Each of Teletrac Navman and Trafficmaster is referred to herein as a “**Company**” and collectively as the “**Companies**”.

These obligations comprise releasing a statement, signed by a Director, which details the steps the Companies have taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of their businesses.

#### 2. Organisational structure, business and supply chains

Teletrac Navman forms part of the Fortive Group (“**Fortive**”), an international group of corporate entities whose principal activity is the production and supply of high quality, specialist technology to solve customers’ critical needs.

Teletrac Navman’s own principal activity is the provision of software for motor vehicles. This software embodies intelligent vehicle services which enhance driving experience and improve business performance by saving the time and money of drivers and companies while reducing their environmental impact.

#### 3. Teletrac Navman policies in relation to slavery and human trafficking

Our company and its wider group deplore human trafficking and modern slavery in all its forms. We support the MSA and its underlying aims.

It is the established policy of the Fortive Group that workers at supplier facilities have the right to freely choose employment. Fortive further expects that all suppliers who do business with Fortive and its subsidiaries will comply with all applicable laws, including the laws against forced or involuntary labour, and this expectation is embodied in Fortive’s Supplier Code of Conduct, available [here](#). The Companies wholeheartedly support these values and objectives.

A significant portion of Fortive’s Code of Conduct for Suppliers addresses labour standards. This part of the Code of Conduct mandates fair treatment in terms of remuneration and working conditions and prohibits abusive, violent or demeaning conduct towards employees as well as precluding all forms of involuntary or child labour, including prison, bonded or indentured labour, and engagement in any form of human trafficking, as well as discrimination.

Fortive publishes a human trafficking and slavery statement pursuant to the California Transparency in Supply Chains Act 2010, which is available [here](#).

Information on TeletracNavman's own corporate social responsibility values and practices is available [here](#).

#### **4. Due diligence processes in relation to slavery and human trafficking**

During the financial year ending 31 December 2016, our Companies considered their response to the MSA.

Having done so and having taken advice, our Companies are embarking on implementing a system of checks on suppliers. Our methodology will be to conduct a risk assessment, based on the Global Slavery Index ("GSI") and other bodies of empirical research which highlight particular sectors where slavery is prevalent.

These checks involve engaging with suppliers in relation to slavery and trafficking issues, considering the content of statements issued pursuant to Section 54 (where available), sending questionnaires designed to elicit relevant information to gauge a supplier's slavery and trafficking risk or where considered appropriate by following up with meetings or supplementary requests for further information. Where available, we will review the content of statutory slavery statements issued by organisations pursuant to Section 54. We also intend to pay particular attention to the practices of those suppliers who enjoy the highest levels of business with us.

#### **5. Parts of our business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps we have taken to assess and manage that risk**

The Companies are engaged in an on-going risk assessment exercise designed to identify areas of risk within its supply chain. To that end, we are assisted by a City law firm who have written a memorandum identifying areas of risk and made recommendations for steps to take to alleviate that risk.

We consider that the areas of highest risk come from suppliers who make use of facilities in those countries where the GSI indicates an elevated slavery and trafficking risk. We are aware, for example, aware that some manufacturing installations in Asia are known to have exploited bonded labour.

The Companies have a global supply chain. Consulting the GSI, however, we have no direct suppliers based in areas of the world which are considered to be medium or high risk. Whilst we have no information to suggest any of these suppliers are tainted by practices of forced labour or trafficking, we fully realise the importance of remaining vigilant and keeping this under review.

Equally, we will not lose sight of the fact that modern slavery and human trafficking practices are also occasionally found in the UK, albeit on a smaller scale. Closer to home, therefore, we will not forget that certain industries may be prone to exploit low-skilled, low paid or migrant workers and require them to work in conditions or under terms that are unacceptable. These known problems are examples of issues where we will be vigilant in our due diligence exercise. Our due diligence efforts, to date, have revealed an encouragingly high level of awareness of modern slavery and trafficking.

We are also aware that certain employment agencies can have an elevated slavery and trafficking risk, particularly where they make travel arrangements or other arrangements on behalf of workers coming to the UK. The Companies, however, make limited recourse to such agencies, meaning our exposure to this particular trafficking risk is low.

#### **6. Training about slavery and human trafficking available to our staff**

The Companies will implement training for all members of staff about modern slavery and trafficking with a view to raising awareness within the organisation. Going forward, all new joiners to the business will be given information on the Modern Slavery Act and our commitments to it during their Company Induction.

We will be encouraging all members of staff to consider Modern Slavery and to raise any concerns they may have regarding it within our own organisation, or within our Supply Chains. The Companies have in place a process for Staff to report any concerns regarding Modern Slavery, including a confidential 'Speak Up' hotline.

#### **7. Effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains, measured against such performance indicators as are considered appropriate**

The Companies will keep our slavery and human trafficking policies and due diligence processes under review to ensure their effectiveness in achieving the desired results. To achieve this end, we will apply the following KPIs as metrics to determine whether the company's policies and procedures are producing the desired effect:

- a) the fulfilment of our due diligence program on selected suppliers within the relevant financial year;
- b) the audit process not having given grounds for any concerns regarding modern slavery or human trafficking and CRS not having otherwise received reports of suppliers being complicit in such practices;

- c) the completion of training for all key procurement and supply management personnel as well as others and the completion of follow-up quizzes by attendees, which we expect to demonstrate a high level of understanding of the subject matter;
- d) the implementation of an operational whistleblowing facility for staff to enable them to report suspicions of modern slavery or human trafficking occurring in the business or supply chain;
- e) incorporation, within the financial year, of a set of values into the manual with which franchisees are required to comply.

## 8. Approval

This statement has been approved by the boards of directors of the Companies, which have delegated approval of this statement on its behalf to the Chairmen and Managing Directors of each of the Companies.



**Richard Lilwall**  
**Managing Director**  
Teletrac Navman (UK) Limited  
**Managing Director**  
Trafficmaster Traffic Services Limited

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