

# Our policies

## **Anti-Slavery and Human Trafficking Policy Statement**

**Pointer Ltd**

**Organisation:** Pointer Ltd

**Version No:** 5.0

**Date:** 14th August 2025

## Scope

This policy applies to all colleagues, contractors, suppliers, and business partners involved in our operations and supply chain. It covers all activities and processes within our organisation and ensures compliance with:

- The Modern Slavery Act 2015
- The Human Trafficking and Exploitation (Scotland) Act 2015

This policy supports the UN Sustainable Development Goals, particularly:

- SDG 8: Decent Work and Economic Growth
- SDG 16: Peace, Justice, and Strong Institutions

## Commitment

We are committed to ethical conduct, integrity, and transparency. We maintain systems and controls to prevent modern slavery and human trafficking, including:

- Supplier approval processes
- Risk assessments
- Audits
- Awareness and trauma-informed training
- Reporting mechanisms

We recognise our responsibility to ensure that all individuals working with or for us are not exploited, are safe, and are treated with dignity and respect. This includes adherence to employment, health and safety, and human rights laws, including freedom of movement and communication.

We adopt a trauma-informed approach in all interactions with potential victims, ensuring compassion, confidentiality, and appropriate support.

## Governance

Responsibility for identifying, assessing, and responding to modern slavery risks is shared across key roles. The Technical & Compliance Manager leads the operational implementation of modern slavery controls, including risk assessments, supplier due diligence, and internal training. Oversight and strategic direction are provided by the Executive Leadership Team, with senior-level accountability held by the Board, who review and approve the annual Modern Slavery Statement. This structure ensures that modern slavery risks are managed proactively and transparently across all levels of Pointer.

## Communication

This policy is integrated into our ISO Management Systems and is communicated across all levels of the organisation and supply chain. We ensure:

- Accessibility and understanding of the policy
- Supplier and contractor awareness
- Victim-centric language and practices

## Anti-Slavery and Human Trafficking Policy Commitment

- Feedback mechanisms for continuous improvement

### Supply Chain

We operate a rigorous supplier approval process that includes:

- Risk assessments for modern slavery and human trafficking
- Evaluation of supplier policies and practices
- Annual review of supplier compliance

We will not engage with any business knowingly involved in slavery or human trafficking. All suppliers must agree to our Supplier Code of Conduct and demonstrate compliance with minimum standards of care.

### Objectives

- Request and review our Largest Suppliers Anti-Slavery and Human Trafficking Policies and conduct risk assessments.
  - Include modern slavery controls in our Risk Register and assess all new suppliers and contracts.
  - Conduct on-site audits to verify workers' right to work and legal status.
  - Perform Right to Work checks for all new colleagues to ensure legal status and compliance.
  - Ensure all colleagues complete annual training on modern slavery awareness and trauma-informed practices.
- Establish mechanisms to gather and incorporate feedback from victims into policy and practice reviews.

### Review

This policy is reviewed annually and updated in line with:

- Changes in legislation and government guidance
- Feedback from victims and stakeholders
- Outcomes of audits and risk assessments

Progress against objectives is reviewed during Management Review Meetings, and continuous improvement is a core principle of our approach.