

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

Protech Communications has 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 committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, 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.

The Purpose of This Policy Is To:

- set out our responsibilities, and of those working for us, in observing and upholding our position on modern slavery and human trafficking
- and provide information and guidance to those working for us on how to recognise and report concerns regarding modern slavery and human trafficking.

In this policy, 'third party' means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, sub-contractors, joint venture partners, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Who Is Covered by The Policy?

This policy applies to all employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, whether located within or outside the United Kingdom (collectively referred to as workers in this policy).

The Directors have primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

What Is slavery?

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.

Your Responsibilities

The directors have the overall responsibility for ensuring this policy is distributed and complies with our legal and ethical obligations and that all those under our control comply with it.

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

The Managers have 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.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The prevention, detection and reporting of slavery and Human trafficking are the responsibility of all those working for us or under our control.

How To Raise a Concern

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 line manager as soon as possible, if you believe or suspect that a breach of 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 that a breach of this policy has occurred or that it may occur you must notify your manager in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If you are 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, you should raise it with your manager.

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

Protection

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy.

We are committed to ensuring no-one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your Line Manager immediately.

Communication

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who are involved in managing recruitment and our supply chains.

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

Recruitment

Our recruitment team follows firm policy and only uses agreed specified reputable recruitment agencies. To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:

- conducting background checks
- investigating reputation
- ensuring the staff an agency provides have the appropriate paperwork (eg work visas)
- ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying

We keep agents on the list under regular review, at least every 3 years.

General recruitment

We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

We always ensure staff are legally able to work in the UK.

We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures.

Monitoring and Review

The Management Team will review compliance with this Policy Statement annually.

This policy does not form part of any employee's contract of employment or otherwise any contract with any third party and it may be amended at any time.

Signed



Date 21.09.26

Print name J.Sharples