

CORPORATE SOCIAL RESPONSIBILITY POLICY



TRAC International Ltd and subsidiary companies (TRAC) are fully committed to developing a reliable and sustainable business and recognise the importance of corporate social responsibility in achieving this. We are dedicated to delivering services that contribute to the wellbeing of our staff, our clients, the communities in which we work and the environment in which we live. We commit to developing and maintaining our strong values throughout all activities of the company.

To achieve this, we will consider our social responsibility through all levels of the supply chain:

We will treat all customers openly and fairly. All company documentation issued to customers shall be a truthful representation of TRAC. We will welcome all feedback and deal with any issues arising swiftly and proactively. All feedback shall be used to continually improve our services and products.

TRAC aim to promote ethical business practices and policies that protect workers. Specifically, TRAC:

- Have in place rigorous HR and recruitment processes to ensure qualification and entitlement of persons to work in the countries that we operate in.
- Shall assess our suppliers' corporate social responsibility and ethics and will not knowingly award business to socially or environmentally irresponsible suppliers.
- Are committed, where appropriate, to ensuring due diligence in procuring conflict-free minerals and require our suppliers to adhere to these standards to help achieve a conflict-free supply chain.
- Will treat our suppliers fairly, ensuring timely payment and open communication.
- Shall publish an annual Modern Slavery Transparency Statement.

We recognise that modern slavery is a crime resulting in an abhorrent abuse of human rights and from being abused and exploited. As such, TRAC strive to ensure a transparent supply chain in accordance with Section 54, the Modern Slavery Act 2015.

We aim to employ and retain staff of ability and integrity, who are committed to working together and supporting our principles. We will strive to ensure equality between all levels of staff, in accordance with our Human Resources Policy (TRACPOL C03) promoting a courteous and respectful working culture. Furthermore, we will afford employees as much responsibility and autonomy over their roles as possible. We will invest heavily in our staff, further developing each individual's skills and knowledge to ensure their personal job satisfaction.

To support local communities, we will select local businesses to supply us wherever possible. We will also consider the effects of our operations and the opinions of local residents, particularly in situations where there is a risk that noise, dust etc. may pollute the local environment. We may further contribute by employing local staff as our company grows, by taking an active interest in local events and issues, and by completing projects that add value to the areas we are working in.

We are fully committed to minimising any negative impacts we may have on the environment. See Company Policy – TRACPOL C01.

The content of this policy is supported by TRAC's management system and associated procedures and work instructions.

For and on behalf of TRAC International and subsidiary companies:

Managing Director: K Stephen

Signature:

A handwritten signature in blue ink, appearing to be "K Stephen".

Date: 31st January 2018