



HUMAN TRAFFICKING & ANTI-SLAVERY POLICY

1. Policy Statement

This policy outlines the efforts Pangeotek will make to seek to eradicate human trafficking and slavery from our business dealings. Pangeotek opposes any use of slavery or human trafficking in the supply and distribution of our services and fully supports the promotion of ethical and lawful business practices within our workplace.

We will not tolerate or condone any form of practice that constitutes human trafficking or slavery in any part of our organisation. We uphold ethical standards and comply with the **Modern Slavery Act 2015**, ensuring transparency and accountability.

2. Scope

This policy applies to all employees, contractors, suppliers, and business partners associated with Pangeotek.

3. Responsibilities

Management must ensure compliance with this policy. Employees and sub-contractors must report concerns regarding unethical practices.

Suppliers & Partners are expected to adhere to ethical labour practices and provide evidence of compliance. Pangeotek suppliers and sub-contractors are an important part of our success and culture. We expect each of these business partners to conduct their business with the same commitment to ethical business practices as Pangeotek. The workplace practices that we expect from our suppliers and sub-contractors include:

- Suppliers/sub-contractors are not to use slave labour, illegal child labour or forced labour.
- Suppliers/sub-contractors will ensure that the overall terms of employment are voluntary.
- Suppliers/sub-contractors shall follow all local applicable laws pertaining to the number of hours worked in a seven (7) day week.
- Suppliers/sub-contractors shall follow all local applicable laws pertaining to age requirements, wages, overtime and benefits.
- Suppliers/sub-contractors will periodically certify that they conform to the expectations described above and that all materials incorporated into their products comply with the laws regarding human trafficking and slavery of the country or countries in which they are doing business.
- Suppliers/sub-contractors must be able to demonstrate compliance with this Policy at the request and satisfaction of Pangeotek.

This document is uncontrolled when not viewed on the company's Activ system

4. Due Diligence

Pangeotek will:

Conduct supplier audits to verify ethical labour practices.

Require suppliers to be transparent in their compliance with anti-slavery laws.

Maintain records of supplier assessments and any corrective actions.

5. Reporting & Whistleblowing


Employees, sub-contractors and stakeholders can report concerns confidentially via the Quality Assurance Manager. Reports will be investigated promptly, and corrective actions taken. If a supplier to Pangeotek is found to be in violation of this policy we will take prompt remedial action to address the violation.

6. Training & Awareness

All employees will receive training on identifying and preventing modern slavery risks.

7. Compliance & Review

This policy will be reviewed annually to ensure effectiveness and alignment with evolving regulations.

A handwritten signature in black ink, appearing to read 'Lee White', with a horizontal line underneath it.

Lee White
Director/Principal Consultant
Pangeotek Ltd

Last Reviewed 14th May 2026