

Modern Slavery and Human Trafficking Statement

Modern Slavery Act 2015

1. Introduction

This statement is made on behalf of Teletrac Navman (UK) Limited and is issued pursuant to our obligations under the UK's Modern Slavery Act 2015 (“**MSA**”). Teletrac Navman (UK) Limited is referred to herein as the “**Company**”.

These obligations comprise releasing a statement, approved by the board and signed by a Director, which details the steps the Company has taken to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of its businesses. This statement is also displayed on our website at the following link: <https://www.teletracnavman.co.uk/modern-slavery-act>

The statement refers to our financial year ending 31st December 2022. We have, however, also described in this statement actions and policies implemented since that time.

2. Organisational structure, business and supply chains

Teletrac Navman Limited forms part of the Vontier Group (“**Vontier**”), an international group of corporate entities whose principal activity is the production and supply of high quality, specialist technology in mobility technologies, retail and commercial fuelling, fleet management, telematics, vehicle diagnostics and maintenance, and smart cities.

3. Teletrac Navman Limited 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 Vontier Group that workers at supplier facilities have the right to freely choose employment. Vontier further expects that all suppliers who do business with Vontier and its subsidiaries will comply with all applicable laws, including the laws against forced or involuntary labour, and this expectation is embodied in Vontier's Supplier Code of Conduct, available [here](#). The Company wholeheartedly supports these values and objectives.

A significant portion of Vontier'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.

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

The Company considered its ongoing response to the MSA.

Having done so and having taken advice, the Company will embark over the coming years on implementing a system of checks on suppliers. Our methodology will be to conduct periodic risk assessments, on tackling modern slavery and other bodies of empirical research which highlight particular sectors where slavery is prevalent.

These checks will 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 will be taking to assess and manage that risk

The Company will engage 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 provided advice in order to identify 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.

While many of the suppliers to the Company are based within the United Kingdom, the Company has a global supply chain.

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 do 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 do 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 the Company and its divisions will be vigilant in our due diligence exercise. Where we engage with suppliers in high-risk countries, we are able to add our Supplier Code of Conduct as a schedule to our purchase agreements with them.

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 Company, however, make limited use of such agencies, meaning our exposure to this particular trafficking risk is low. Nonetheless, we will remain vigilant and ensure that employment

agencies form a part of our due diligence efforts. Furthermore, where we deem it appropriate, we will ask questions about candidates during the recruitment process which are designed to spot red flags and determine whether there could be problems.

6. Information about slavery and human trafficking available to our staff

The Company has an internal code of conduct which includes information and internal policies on identifying and reporting breaches of human rights standards. The Company code of conduct ensures that the Vontier community promotes an ethical and compliant workplace. Employees are encouraged to actively monitor business partners and stay alert for any violations of the code of conduct as well as speak up if they become aware of any misconduct. We also have a helpline available to those within our business and also to our suppliers. This could be used to report modern slavery concerns if they were identified.

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

- a) the fulfilment of our due diligence program on selected suppliers within the relevant financial year; and
- b) 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.

8. Approval

This statement has been approved by the board of directors of the Company, which have delegated approval of this statement on its behalf to the Directors of each of functional businesses in the Company.

Director

Teletrac Navman Ltd

Mick Savage

30th June 2023