



## **MODERN DAY SLAVERY ACT 2015**

### **ANTI SLAVERY AND HUMAN TRAFFICKING POLICY**

Updated August 2025

#### **Policy Statement**

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 deprive a person of their liberty in order to exploit them for personal or commercial gain.

Tracsis plc ('the Company') and its subsidiary companies (together 'Tracsis' or 'the Group')<sup>1</sup> have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all its business dealings and relationships. We have adopted and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our business. We are also committed to ensuring transparency in our business and in our approach to tackling modern slavery, which is consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and business partners. This is monitored through the existing supply chain management process.

This policy applies to all persons working for Tracsis or on our behalf in any capacity, including employees at all levels, agency workers, contractors, external consultants, third-party representatives and business partners. This policy forms part of any employee's conditions of employment and we reserve the right to amend it at any time.

#### **Group Structure, Business and Supply Chains**

Tracsis plc is UK incorporated company and listed on the AIM stock exchange. Our group includes UK and US rail technology solutions, traffic data and management solutions, and GeoIntelligence and GIS solutions. The Tracsis group employs c.550 people for the period covered by this statement.

Due to the varied nature of our group, we have different supply chains for each business. We are predominantly a software development and consultancy services business and therefore we are not exposed to high areas of risk. We procure some hardware components for an element of our Rail Technology business, 75% of which are from two UK based suppliers, which either have a conduct policy in place or have arrangements that ensure they comply with the legislative or statutory landscape. Our top five suppliers cover 90% of all purchases and are all UK-based.

#### **Responsibility**

- The Executive Directors of Tracsis plc hold overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all employees comply with it.

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<sup>1</sup> Details of Tracsis plc subsidiaries can be found at Appendix A



- Divisional Managing Directors are responsible for the day-to-day implementation of this policy, monitoring its use and effectiveness and auditing internal procedures to ensure they are effective in countering modern slavery. They are also responsible for identifying nominated managers (below).
- Nominated Managers are responsible for ensuring that they read, understand and comply with this policy. If they are in any doubt, guidance is to be sought from Divisional Managing Directors.
- The People team maintain a Recruitment Policy that includes conducting checks on eligibility to work to safeguard against modern slavery and human trafficking. Where we need to use agencies to source new hires, we only work with reputable firms and we endeavour to check their practices before entering partnering agreements. All UK employees inclusive of temporary staff receive at least the national minimum wage.

The Company also maintains a Whistleblowing Policy and reporting system, which allows individuals to report concerns including those related to Modern Slavery, anonymously if required, which are investigated.

## **Compliance**

Guidance for Nominated Managers:

- The prevention, detection and reporting of modern slavery in any part of our business or supply chains should be of concern to all colleagues, and in particular Managers, who are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery encountered in any part of our business or supply chains at the earliest opportunity, using the Company's Whistleblowing Policy and process if appropriate.
- If you believe or suspect a breach of this policy has occurred, or that it may occur, you must notify the Divisional Managing Director without delay.
- If you are unsure about whether a particular act or incident within Tracsis or its supply chain constitutes modern slavery, you should report the incident regardless of any uncertainty you hold.
- The Company will encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- The Company is 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.



- If a Company employee believes that they have received inappropriate treatment after raising a concern under this policy, they should inform their Line Manager and if necessary, resort to the Grievance Procedure detailed in the Company's Employee Handbook.

### **Our Key Performance Measures**

- Given the nature of our business activities, we assess our largest risk to be the use of casual labour in our Events business and we have robust mitigation measures in place. We monitor key performance indicators such as ensuring Right To Work checks are undertaken for all staff across the Group and these performance measures are reported to Senior Management on a regular basis.
- A summary of reported whistleblowing incidents is provided to the Board of the Company on a six monthly basis.

### **Communication, awareness and training**

This policy is disseminated to all Tracsis employees at least annually and Divisional Managing Directors are responsible for ensuring that employees understand this policy and its practical application, and that it is implemented and complied with.

A copy of the Modern Slavery Act 2015 is accessible electronically, from here:  
<http://www.legislation.gov.uk/ukpga/2015/30/contents>

In accordance with Clause 54(7) of the Modern Slavery Act 2015, a copy of this policy is also published on the Tracsis plc website.

Our zero-tolerance approach to modern slavery must be communicated to suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breaches of Policy**

Any employee who breaches this policy may face internal disciplinary action, which could result in summary dismissal. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

The Modern Slavery Policy was last considered by the Board in January 2025 and is subject to annual review.

Signed:

Date: 19 August 2025

Andrew Kelly

Chief Financial Officer

## Appendix A

This statement covers Tracsis plc and its subsidiaries, which at August 2025, comprises:

- Tracsis Rail Consultancy Limited (05047148)
- Tracsis Passenger Analytics Limited (03313714)
- Safety Information Systems Limited (02588404)
- MPEC Technology Limited (03921641)
- Tracsis Traffic Data Limited (03896384)
- Datasys Integration Limited (07058646)
- Tracsis Retail and Operations Limited (04225250)
- SEP Limited (03665882)
- SEP Events LTD (09382850)
- Ontrac Technology Limited (08423588)
- Ontrac Limited (06662069)
- Tracsis Travel Compensation Services Limited (10390176)
- Tracsis Events Limited (03524447)
- Compass Informatics Limited (Ireland based)
- Bellvedi Limited (08316870)
- Tracsis Rail Technology & Services Limited (03949810)
- Flash Forward Consulting Limited (07946174)
- Compass Informatics UK Limited (08029553)
- Northbrook Investments Limited (Ireland based)
- The Icon Group Limited (Ireland based)
- Railcomm, LLC (US-based)
- Railcomm Associates, Inc (US-based)
- Tracsis Group US Holdings, LLC (US-based)
- S Dalby Consulting Limited (10386483)
- Sky High Data Capture Limited (02383178)
- Sky High Traffic Data Limited (04258332)
- The Web Factory Birmingham Limited (03211201)
- Forsyth Whitehead & Associates Limited (02631557)
- Sky High Technology (Scotland) Limited (05064418)
- Count on Us Traffic Limited (05066587)
- Burra Burra Distribution LTD (01616437)
- Sky High (NCS) Limited (05121297)
- Halifax Computer Services Limited (04935845)
- Skyhightraffic Limited (05055712)
- The Traffic Survey Company Limited (05574532)
- The People Counting Company Limited (05877333)
- Myratech.net Limited (06023527)
- Footfall Verification Limited (07086920)