



**Traffic Open Products and Specifications**

## **ANTI SLAVERY POLICY**

### **1. Introduction**

1.1. Traffic Open Products and Specifications Limited (**TOPAS**) values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the members of the Company's Management Board as well as others acting on the Company's behalf are key to maintaining these standards.

1.2. The purpose of this document is to set out the Company's policy in relation to modern slavery. The policy applies strictly to those identified as Management Board members and those acting on the Company's behalf from time to time whilst in that capacity only.

### **2. Modern Slavery**

2.1. This policy is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that **TOPAS** has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

2.2. Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. **TOPAS** accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

### **3. TOPAS Policy**

3.1. **TOPAS** has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings to safeguard against any form of modern slavery taking place within the business of the Company.



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### 4. Breach of Policy

4.1. **TOPAS** may terminate its commercial relationship with any member of the Company if they are found to have been involved in modern slavery.

### 5. Member responsibility and how to raise a concern

5.1. The prevention, detection and reporting of modern slavery is the responsibility of all Board Members. If you become aware or suspect that an element of modern slavery is proposed or has taken place in respect of the business of **TOPAS**, then you have a duty to report this to the appropriate authorities. Members are also requested to pass such information onto the responsible person at **TOPAS**.

5.2. The **TOPAS** responsible person for this Anti-slavery Policy is the Administrator.

5.3. This policy shall be reviewed every three years.

Dated : 18<sup>th</sup> October 2018

Ratified by the Management Board:

Signed (Chair)  
On behalf of the Management Board

Policy review date: April 2021