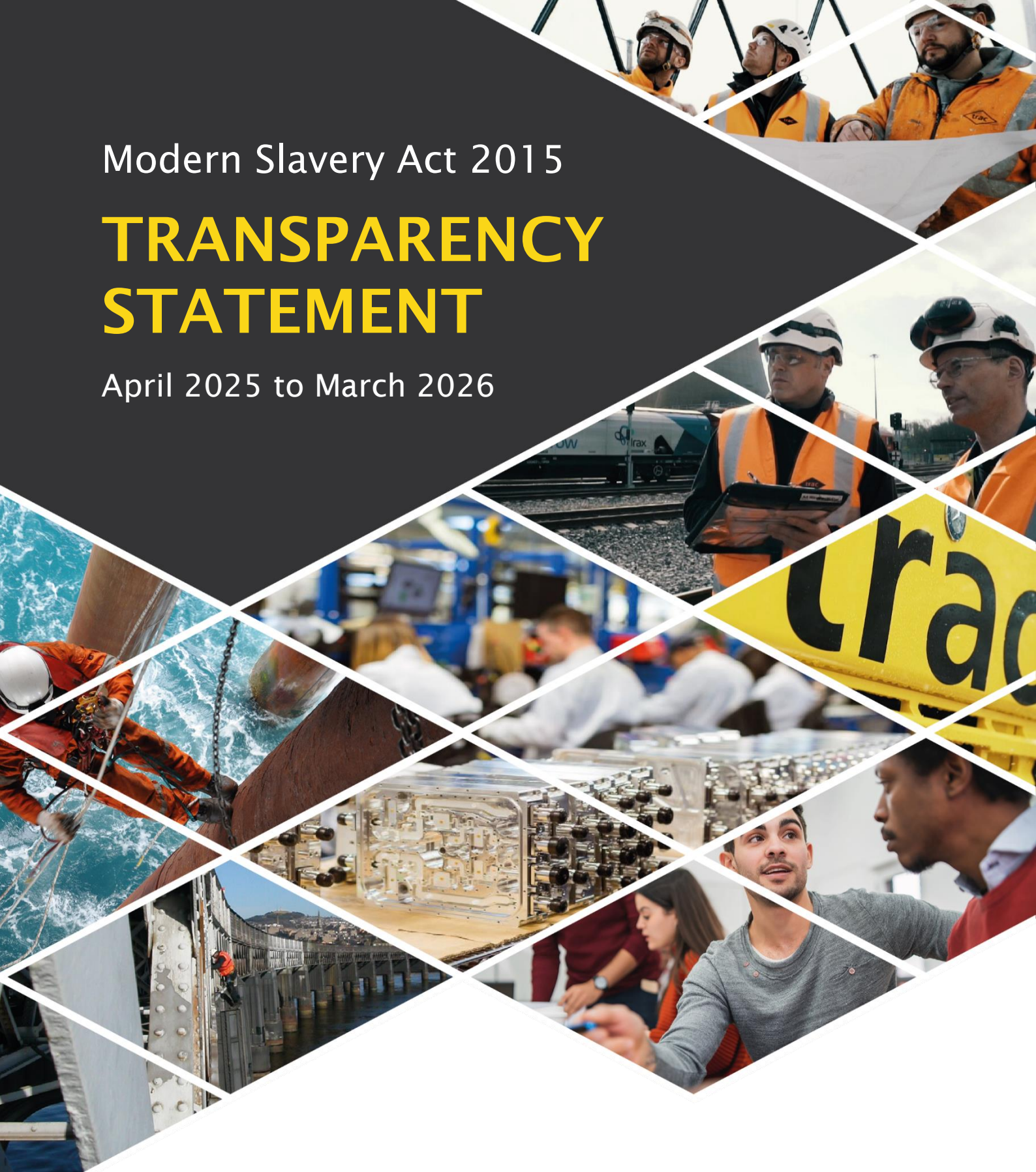




Modern Slavery Act 2015

TRANSPARENCY STATEMENT

April 2025 to March 2026

TRAC International Ltd
and Subsidiary Companies

 **radio design**

trac

MODERN SLAVERY STATEMENT

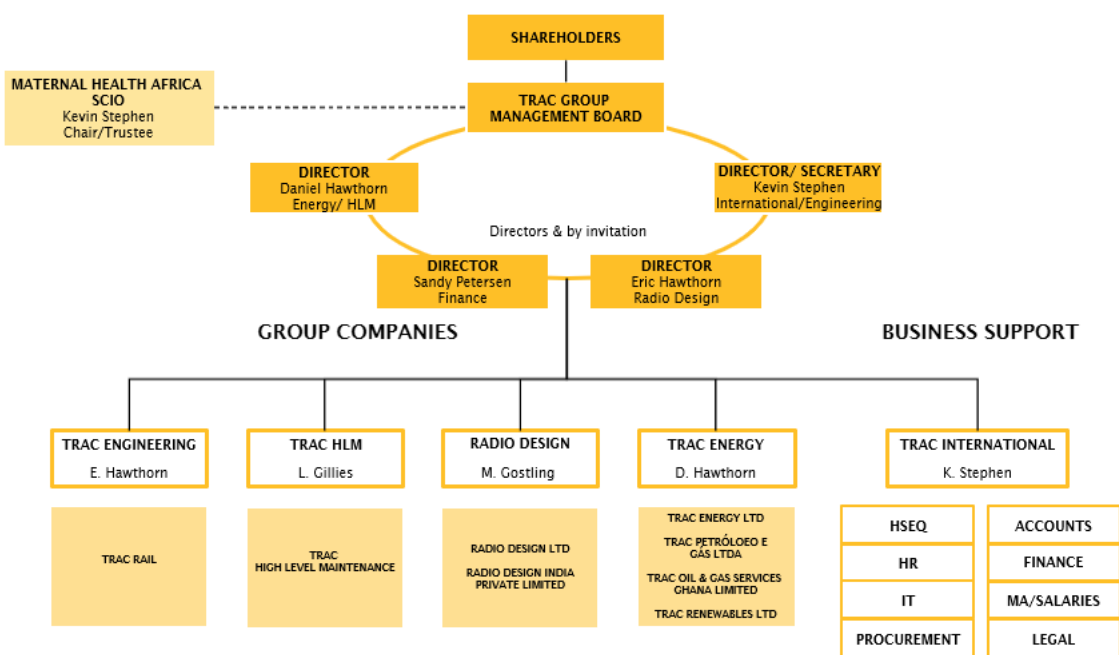
1.0 STRUCTURE

The following statement defines the strategies employed by TRAC International Ltd and subsidiary companies (TRAC) to prevent modern slavery from occurring in our supply chain(s) and organisations.

This statement outlines the steps taken by TRAC International Ltd and its subsidiary companies (TRAC) during the financial year 2025/2026 to identify, assess and address risks of modern slavery and human trafficking within our operations and supply chains.

TRAC recognises that modern slavery is a serious abuse of human rights that can occur across sectors, industries and geographical locations. We are committed to continually improving our approach to preventing, mitigating and responding to modern slavery risks through our governance arrangements, management systems, procurement processes and stakeholder engagement activities.

Our Management Structure is described in TRACORG 2 – this shows the relationship between the Management Board and Group Company Heads.



Ultimate responsibility for policies and any breaches in terms of human rights would be brought to the immediate attention of the Group Company Heads. As an SME, our senior management team would take active roles in the investigation of any issues relating to human rights.

2.0 ORGANISATION, SCOPE & PERFORMANCE INDICATORS

The TRAC International Group provides engineering, maintenance, manufacturing, repair, business support and specialist technical services to customers across multiple international markets.

The Group comprises of the following companies:

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COMPANY	SCOPE
TRAC International Ltd	Provision of corporate business support and management systems and services.
TRAC Energy Ltd	Provision of engineering support via inspection, repair and maintenance services for the Energy, Renewable and Marine Industries.
TRAC Petróleo e Gás Ltda	
TRAC Oil and Gas Ghana	A joint venture providing engineering support via inspection, repair and maintenance services for the Energy Industry.
TRAC High Level Maintenance	Provision of tailored structural fabric maintenance and facilities management services.
TRAC Engineering Ltd	Provision of infrastructure engineering services for the rail industry, including specialist plant and operator hire, vegetation management projects.
Radio Design Ltd	Provision of design, product development and manufacturing for the wireless infrastructure market. Provision of hardware repair services.
Radio Design India PVT. Ltd	Provision of product manufacturing and hardware repair services for the wireless infrastructure industry.

During the reporting period:

Performance Indicator	2025-26
Staff at TRAC/Radio Design 2025-26	199
Turnover for Group 2025-26	£44M
No. of Supply Chain Incidents related to Human Rights 2025-26	0
No. of Grievances/complaints related to Human Rights 2025-26	0

No confirmed incidents of modern slavery, forced labour, child labour or human trafficking were identified within TRAC operations during the reporting period.

UNGC Training – Sustainable Supply Chains was completed by TRAC International personnel.

3.0 SUPPLY CHAINS

COMPANY	SUPPLY CHAIN
TRAC International Ltd	Primarily local service providers located within the United Kingdom
TRAC Energy Ltd	Tier 1 suppliers are maintained within the Vendor and Asset Register. 93% of business-critical suppliers are UK companies. No suppliers were identified in countries currently assessed by TRAC as presenting elevated modern slavery risk.

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TRAC Petróleo e Gás Ltda	Supply chain mapping and risk assessment activities are ongoing. Further supply chain visibility remains an area for improvement during the next reporting period.
TRAC Oil and Gas Ghana	Supply chain mapping and modern slavery risk assessment activities are being further developed.
TRAC High Level Maintenance	Primarily local service/goods providers located within the United Kingdom and Ireland.
TRAC Engineering Ltd	Primarily local service/goods providers located within the United Kingdom.
Radio Design Ltd Radio Design India PVT. Ltd Radio Design OY	Key suppliers located in China, Latvia and the United Kingdom. Tier 1 suppliers are maintained within the Approved Vendor List. Tier 2 supplier oversight forms part of supplier due diligence and audit activities undertaken with key Tier 1 suppliers.

4.0 COMMITMENTS

TRAC are committed to:

- Maintenance of internal controls to address the issue of modern slavery.
- Continual improvement of our systems by expanding upon control measures as new opportunities and risks in relation to this issue are identified.
- Legal Compliance
- Ethical Standards (e.g fair treatment of workers, sustainability plans)
- Respecting Human Rights – also see TRAC’s Sustainability and Social Value Policy TRACPOL C06)
- Raising awareness of modern slavery issues
- Applying this policy and communicating it within the business and our supply chain
- Address and directly prohibit practices that are known to contribute to the risk of modern slavery (e.g. TRAC will ensure a transparent supply chain, good labour practices, good working environment etc).

5.0 RISK MANAGEMENT AND DUE DILIGENCE

Throughout the April 2025 to March 2026 financial year, TRAC took the following measures.

5.1 Risk Management

In accordance with TRACPROC C12 – Risk Analysis and Risk Management Procedure, TRAC methodically assessed all business risks related to our activities. This helped to direct strategic decision(s) and facilitate sustainability over the financial year, enabling TRAC to deliver to the highest standard possible.

The types of risks that were assessed included:

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- Strategic – competition; customer changes; industry changes; customer demand; R&D; intellectual capital etc.
- Compliance – with legislation, standards etc.
- Financial – interest rates; foreign exchange; credit; liquidity/cash flow etc.
- Operational – culture; recruitment; supply chain; information systems; accounting controls; system malfunction; loss of key staff etc.
- Reputational – damage to customer relationships; trust etc

This process allowed TRAC to identify any areas of high risk (such as those in our supply chain) and put in place risk management strategies proportionate to the identified risk. We continued to recognise that this is an essential process when investigating the potential to enter a new market or launch a new product or service.

No high-risk issues relating to modern slavery were identified through the risk management process during the reporting period.

5.2 Governance and Management Systems

TRAC operates an integrated management system designed in accordance with ISO 9001, ISO 14001 and ISO 45001:

During the reporting period:

- All company activities were planned to ensure they were carried out effectively and efficiently, while complying with company policies.
- Implementation of planned activities was done in accordance with relevant procedures, standards, legislation etc.
- Key activities were monitored and evaluated to identify good practice and scope for improvement.
- Feedback from all activities was reviewed by Senior Management with actions identified to improve company performance.
- Sustainability and Social Value commitments including human rights considerations, continued to form part of management system governance.

TRAC Senior Management retains responsibility for ensuring that modern slavery risks are appropriately considered within the organisation's broader governance and risk management framework.

5.3 HR and Employment Processes

TRAC comply with applicable legislation for all areas in which we operate. HR and recruitment processes are in place (supported by TRACPOL C03 – HR Policy) to ensure qualification and entitlement of persons to work in both the United Kingdom and all other countries that we operate. TRAC employ competent HR Managers and appoint external legal consultants to interpret and advise on employment law and ensure adherence to these standards.

Concerns about slavery or human trafficking can be raised with Line Managers for appropriate action.

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5.4 Supplier Due Diligence

TRAC have Vendor Approval processes that assess the supply chain's corporate social responsibility and ethics. Suppliers are required to confirm compliance to TRAC's Code of Conduct (TRACINFO C04.26) and provide a copy of their Social Responsibility (or equivalent) Policy. If a supplier does not have their own policy, they must confirm compliance to TRAC's policy (TRAC POL C06) as part of approval.

This process was subject to audit and review over the year to ensure that the vendors we utilised conformed to the standard expected by us. Key suppliers were subject to onsite audits where deemed appropriate.

Radio Design maintains enhanced supplier due diligence activities reflecting the international nature of its supply chain with the aim of verifying that working conditions are acceptable and that there is no forced or child labour within the supply chain.

These activities include:

- Supplier questionnaires and audits, with "SCARs" raised and investigated as required
- Assessment of labour practices and working conditions.
- Review of suppliers' policies relating to forced labour, child labour and worker welfare.
- Ongoing monitoring of critical suppliers.
- Management review of supplier performance trends.

No indicators of forced labour or child labour were identified during supplier reviews conducted in the reporting period.

5.5 Due Diligence – Conflict-free Minerals (Radio Design only)

Radio Design has identified conflict minerals as a specific supply chain risk area.

Radio Design have processes implemented that ensure our suppliers adhere to these standards to help achieve a conflict-free supply chain. Radio Design retain conflict mineral statements from any supplier who uses tin or lead in their processes.

Printed Circuit Board (PCB) supplier processes were subject to review by the Quality Management Team, with the guidance and technical input of the Quality Manager.

TRACINFO C04.11 – Code of Conduct sets out the minimum standards that Radio Design expect our suppliers to adhere to including child/forced/compulsory labour. All suppliers are required to fill out TRACFORM RD 13.04 – Radio Design HSEQ Questionnaire detailing their Corporate Social Responsibility policies in addition to question on ethics, employment conditions and labour laws (included forced/bonded labour).

5.6 Training and Awareness

During August 2025, relevant personnel completed the United Nations Global Compact Sustainable Supply Chains training programme.

TRAC continues to support the principles of the UN Global Compact relating to:

- Human rights.
- Labour standards.
- Environmental responsibility.

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- Anti-corruption.

Training and awareness activities form part of our wider effort to strengthen understanding of responsible business conduct and supply chain risks.

5.7 Reporting and Remedy

Mechanisms for reporting (and subsequent investigation) are in accordance with our Non-conformance/Corrective Action process. In extreme cases, individuals may wish to use our anonymous reporting mechanisms – see TRAC's Whistleblowing policy (TRACPOL C13). No issues were reported via this method in 2025-26.

No incidents have been reported regarding modern slavery issues. TRAC recognises that the absence of reported incidents does not necessarily indicate absence of risk and will continue to strengthen reporting, monitoring and due diligence activities.

6.0 EFFECTIVENESS AND FUTURE IMPROVEMENTS

Priority actions for 2026-27 include:

- Improving supply chain mapping for overseas operations.
- Formalise Human Rights Risk Assessment
- Revision of Supplier/Subcontractor Questionnaires
- Expanding modern slavery awareness training across the Group
- Development of Human Rights Due Diligence and Remediation Guidance

7.0 STATEMENT

TRAC have proactively taken steps to implement due diligence measures by integrating the issue of modern slavery into our (and associated supply chain) management systems and company risk management processes as outlined above.

This statement was approved by the Board of Directors of TRAC International Ltd and is issued in accordance with Section 54 of the Modern Slavery Act 2015.

For and on behalf of TRAC International and Subsidiary Companies:

Managing Director	K. Stephen	Signature
Date	01/07/2026	

