

# Slavery & Human Trafficking Policy



Panoptech is committed to maintaining and improving our systems and processes, in an endeavour to avoid complicity in human rights violations, related to our own operations and that of our supply chain.

Panoptech recognises that slavery and human trafficking can occur in many forms. Therefore, throughout this disclosure we use the terms “slavery and human trafficking” to incorporate all forms of coerced labour.

Our commitment to human rights is embedded within our culture and reflected within our Company policies and procedures. We are very conscious of our obligation to improve and implement the Code of Conduct across our supply chain. Panoptech will strive to ensure that slavery and human trafficking is not taking place within our directly employed workforce or forming any part of our supply chain. In addition to the legal requirement we have also agreed to uphold The Athens Ethical Principles, which demonstrate our proactive commitment towards ending modern slavery and human trafficking by the year 2030.

Our in-house, direct recruitment processes are reviewed regularly and include face to face communications with any potential candidates. We also confirm identities by checking originals of relevant identification documents and ensure all payments are made directly into a personal bank account.

Within our supply chain we are implementing processes to ensure, as reasonably practicable, that our supply chain are adhering to our expectations within their own work force. These requirements necessitate that our approved supply chain demonstrates the steps they are taking to ensure slavery & human trafficking are not taking place within their businesses and their own supply chains. Panoptech will be carrying out targeted audits within areas of our supply chain which are identified as most at risk, alongside random audits of our general supply chain members.

All of the Panoptech team encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues or concerns regarding ethics, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud, bribery and any concerns regarding slavery and human trafficking.

Signed:

Mr Kevin McDonald  
MANAGING DIRECTOR

NETWORKS PRODUCTS SECURITY ASSIST

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