

Modern Slavery and Human Trafficking Statement

Introduction

Modern slavery is a crime resulting in abuse of the human rights of vulnerable workers, including children. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking.

This Modern Slavery and Human Trafficking Statement relates to actions and activities of the Ultratec Group and its subsidiary companies (Hereon in 'the Group').

The statement sets down the Groups commitment to its zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations.

We all have a duty to be alert to risks, however small. Staff are expected to report any concerns to Management to be acted upon.

Organisational structure and supply chains

This statement covers the business activities of each Company under the Ultratec Group which are as follows:

- **Ultratec Ltd**
The supply, distribution and repair of new and end of line data storage devices, including data erasure or recovery to customer requirements. IT recycling.
- **Ultrarecycle Ltd**
IT Recycling service provider, including data erasure and destruction activities for IT equipment. Sorting and Stripping of materials and equipment.
- **Ultrasupport**
Offsite storage replication of IT equipment specialists. Onsite support service provider.
- **Ultratest**
Designer, developer, distribution and assembling of data storage erasure solutions with support services.

All Companies operate in the UK.

Manufacturing of Genesis machines are manufactured in the UK.

Responsibility for the Company's anti-slavery initiatives are as follows:

Policies: The Company Secretary and Compliance Manager are responsible for creating and reviewing policies on an annual basis. The process by which policies are developed by looking at best practice and adapting to the needs of the Group.

Due diligence: The Managing Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding and awareness of the risks of modern slavery and human trafficking in our business, the Group has an ongoing commitment to provide all Managers and Supervisors training awareness by means of a training presentation. The Presentation shall contain video clips linked from the official home office website. In addition, a booklet entitled 'Modern Slavery - Spot the signs' along with the training awareness presentation are made publically available within the Group on the Management system.

Policies

The Group is committed to ensuring that there is no modern slavery or human trafficking in our business. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

Right to Work Policy: The Group has a duty to prevent illegal working and carries out relevant document checks to ensure each person we employ is legally allowed to do the work in question.

Employee code of conduct: The Group is embarking upon delivering an annual training awareness on the code of conduct that makes it clear to employees the actions and behaviour expected of them when representing the Group. The Group strives to maintain the highest standards of employee conduct and ethical behaviour in its operations.

Due Diligence Processes for Slavery and Human Trafficking

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorse this policy statement and is fully committed to its implementation.

The Ultratec Holdings Board of Directors