

Unatrac Limited
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Statement under the UK Modern Slavery Act for Financial Year 2017

About Unatrac Limited

Unatrac Limited is based in Slough, UK and makes direct export sales of the complete range of new and used Caterpillar Construction, Mining, Power Generation and Materials Handling Equipment to countries its affiliated companies hold Caterpillar dealerships for (these dealers make onshore sales and supply services to customers in these territories). In 2017 these countries were Ghana, Nigeria, Sierra Leone, Liberia, Tanzania, Kenya, Uganda, Egypt, Iraq and parts of Russia. Unatrac Limited does not operate in any of these countries.

Our values and own operations

Unatrac Limited fully supports the aims of the Modern Slavery Act 2015 and is committed to operating free from forced labor, slavery and human trafficking. We have a zero-tolerance approach to forced labor, slavery and human trafficking in any form, in any part of our business or supply chain. Operating ethically includes respect for human rights and our approach on this is informed by the Universal Declaration of Human Rights, the core conventions of the International Labor Organization and the United Nations' Guiding Principles on Business and Human Rights.

Unatrac Limited must comply with all applicable legislation and regulations, and must conduct its activities in line with its Code of Business Ethics. Absolute integrity is a core value and we expect all supply chain partners to operate in accordance with applicable legislation and regulations and to operate ethically when performing a service or supplying a product to us.

Our Code of Business Ethics is incorporated into the conditions of employment of each Unatrac employee. We have a Whistleblowing policy in place for all employees to raise concerns and report instances of potential non-compliance with our values and principles, in full confidence and without fear of retaliation. Respect for human rights and provision of remedy for potential non-compliance are ways in which we uphold our Code of Business Ethics.

Our supply chain

We expect our suppliers and contractors to obey all applicable laws and international standards that require them to treat workers fairly, to provide a safe and healthy work environment and to protect environmental quality. Our own supply chain has been assessed as low risk due to its location and the nature of the goods and services we procure. Each of our suppliers and contractors has its own supply chain and we recognize that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations and for operating ethically including respecting human rights. Our focus, for the purpose of this declaration, is on our own direct suppliers and contractors, however, we encourage suppliers and contractors to share our expectation throughout their own supply chains.

Commitment

We will continue to apply a zero-tolerance approach to forced labor, slavery and human trafficking in any form, in any part of our business or supply chain.

This statement has been approved by the board of directors of Unatrac Limited with respect to the financial year ending 31 December 2017.



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Mr, Graeme J. Robinson
Director, Unatrac Limited
Date: 26 November 2018