

Anti-slavery and Human Trafficking Policy

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. These have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Ultra has a zero-tolerance approach to modern slavery. Ultra is committed to: acting ethically and with integrity in all its business dealings and relationships; and to implementing and enforcing effective systems and controls to ensure modern slavery does not take place anywhere in its business or in any of its supply chains.
- 1.2 Ultra is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains. Ultra expects the same high standards from all of its contractors, suppliers and other business partners.

2. RESPONSIBILITY FOR THE POLICY

- 2.1 Although ultimate responsibility for the implementation of this policy lies with the Ultra Group Board of Directors, this requirement has been delegated to Managing Directors and Presidents who are responsible for the implementation and control of this policy within their respective businesses. Divisional MDs/Presidents are responsible for monitoring the compliance of this policy by the businesses within their division.

3. COMPLIANCE REQUIREMENTS

Managing Directors and Presidents shall ensure that:

- A written policy is maintained by their business which strictly prohibits: the use of modern slavery in their business or their supply chains; and their business does not support or engage suppliers where they are aware of modern slavery within the suppliers' business or supply chains.
- Their business has in place systems to: identify and assess potential risks of modern slavery in their business and their supply chains; mitigate the risk of modern slavery occurring in their business and supply chains; and monitor potential risk areas in their business and supply chains.
- Terms and conditions of purchase forbidding the use of modern slavery practices are adopted by their business with the right to terminate a relationship with a supplier if issues of noncompliance are discovered and/or noncompliance is not addressed in a timely manner.

- Adequate and regular training is provided to employees in their business to ensure a high level of understanding of the risks of modern slavery occurring in their business and supply chains.
- Any breach of this policy is reported immediately to their Divisional MD/President and within their Business Performance Report.

Rakesh Sharma
Chief Executive
November 2016