



Last Modified: June 13th, 2018

Modern Slavery Statement

INTRODUCTION FROM THE PRESIDENT AND COO OF POLE TO WIN INTERNATIONAL

We are committed to improving our practices to combat slavery and human trafficking.

ORGANISATIONAL STRUCTURE

Pole To Win International Limited is the UK-based holding company and has thirteen subsidiaries in nine countries worldwide. Our parent company is Poletowin Pitcrew Holdings, Inc. Poletowin Pitcrew Holdings, Inc. has its head office in Japan. The Group has over 3000 employees worldwide and operates in 11 countries.

Pole To Win International Limited has a global annual turnover of over £40m.

OUR BUSINESS

Pole To Win International Limited is a provider of Quality Assurance, Quality Engineering, Customer Experience, Localization, Translation and Audio Production services in the video games and technology sectors. More than 3000 knowledgeable staff provide quality services for our customers worldwide.

OUR SUPPLY CHAINS

As we provide only above technology services, we do not have supply chains.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place in any part of our business.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our business.
- Mitigate the risk of slavery and human trafficking occurring in our business.
- Monitor potential risk areas in our business.
- Protect whistle blowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all employees and contractors comply with our values, we have in place a compliance programme.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we provide training to our staff.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We have appointed our Director, HR to conduct a review to bring insights on ways that we can tackle slavery and human trafficking. Our Director, HR uses appropriate measures to assess how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Pole To Win International Limited's slavery and human trafficking statement for the financial year ending December 2017.

A handwritten signature in black ink that reads "Deborah Kirkham". The signature is written in a cursive style with a large, looping flourish at the end.

Deborah Kirkham, President and COO of Pole To Win International

Date: June 13th, 2018