

7.0 MODERN SLAVERY POLICY

THE POLICY

Introduction

We have a diverse customer base, one that expects to be served by people with whom they can identify, and our aim is to ensure that this expectation is met and maintained. Encouraging everyone who has contact with SPS Global to recognise that we are uniquely placed to perform an important role in preventing modern slavery and human trafficking. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery.

The purpose of this policy is to:

1. Set out SPS Global's approach to preventing modern slavery within our business and
2. Clarify our role in complying with relevant law and safeguarding vulnerable persons against modern slavery.

Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, sub-contractors, interns, work experience, consultants, third party representatives and business partners. This includes staff employed on permanent, or temporary contracts.

1. This policy does not form part of any employee's contract of employment.
2. This policy may be amended at any time.

SPS Global approach

SPS Global have a zero-tolerance approach to modern slavery in its own business or in our business dealings and relationships with other companies.

We will maintain and enforce effective systems and controls to prevent modern slavery, including;

1. Working collaboratively with SPS Global partners (in particular suppliers, contractors, clients) to increase awareness detection and prevention of modern slavery and to promote responsibility on this issue; and
2. Ensuring that we are transparent in our action to tackle modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Individuals Responsibilities

1. To avoid any activity that might assist or enable modern slavery and avoid any conduct that could be perceived as being any such activity
2. To raise any concerns about issues or suspicion of modern slavery in any part of the business or supply chain at any tier at the earliest possible stage to your manager.

If staff suspect or witness any breach of this policy, do not remain silent and report it immediately.

1. Staff concerns will be taken seriously and will be investigated in a confidential manner.
2. SPS encourage openness and will support anyone who raises a genuine concern in good faith under this policy, even if they turn out to be mistaken.
3. SPS are committed to ensuring no one suffers any detrimental treatment as a result of reporting such concerns.
 - Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Definition

Modern slavery is a heinous crime and a violation of fundamental human rights which occurs globally, as well as in the United Kingdom.

It can take various forms, including slavery, servitude, forced/compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Each of these forms constitute offences under the Modern Slavery Act 2015.

Specifically, the term "modern slavery" includes:

1. Slavery - the status or condition of a person over whom all or any powers attaching to the right of ownership are exercised, which deprives the victim of their freedom
2. Servitude - the obligation to provide services imposed by coercion and includes the obligation for a "serf" to live on another person's property and the impossibility of changing his or her condition
3. Forced or compulsory labour - the obtaining of work through coercion, penalty, direct threats of violence or more subtle forms of compulsion; and for which the person has not offered him/herself voluntarily
4. Human trafficking - the arranging of or facilitating travel of another person (with or without their consent) with a view to that person being exploited

Policy location and distribution

This policy is available in electronic format on SPS's internal systems, however are available on request to external clients via the HR Manager.

Policy Review

This policy will be reviewed periodically and amended accordingly by the CEO.