




# Spectrum Control UK

## Modern Slavery Policy

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<b>Approval:</b>	 Claire Coleman HR Lead International
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## Review Log

<b>Version Number</b>	<b>Review Date</b>	<b>Name of Reviewer</b>	<b>Reason for Amendments</b>
1		Claire Coleman	New policy
2	1 January 2023	Michael Larkins	New logo

## **Introduction**

Spectrum Control is opposed to modern slavery and human trafficking in all its forms.

## **Scope**

This policy applies to all persons working for Spectrum Control and all subsidiary companies in any capacity, including employees at all levels, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not give contractual rights to individual employees. We reserve the right to alter any of its terms at any time.

## **Definition**

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, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

## **Approach**

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

API are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all our contractors, suppliers, and other business partners. We expect that our suppliers will hold their own suppliers to the same high standards.

## **Responsibility**

The Vice President EMEIA & SSIA has overall responsibility for ensuring this policy complies with our legal and ethical obligations.

Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## **Compliance**

All employees must read, understand, and comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for the Company or on behalf of the Company. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

If you believe or suspect a breach of this policy has occurred or that it may occur (either within the Company, or in the supply chain of any supplier) you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

We seek to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains

### **Communication and Awareness**

This policy will be issued to all employees as part of the Employee Handbook.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breaches**

Any employee who breaches this policy may face disciplinary action, which could result in dismissal.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### **Review**

This Policy will be reviewed every three years or earlier if any significant changes in legislation occur.