



<b>Document</b>	MP05 Modern Slavery Policy	 Consider it <b>done.</b> 
<b>Revision</b>	2	
<b>Revision Date</b>	15.04.2019	
<b>Author</b>	Alistair Constantine	

## Spectrum Safety Limited

### Modern Slavery Financial Year Policy Statement 2018 / 2019

This policy statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that Spectrum Safety Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Spectrum Safety Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

#### Our Business

Following our rigorous supplier approval process within our ISO 9001: 2015 Quality Management System, Spectrum Safety Limited distributes and supplies a range of industrial consumables within the United Kingdom.

#### High Risk Areas

Spectrum Safety Limited have conducted due diligence checks in accordance with our supplier approval process and do not consider there are high-risk areas relating to the requirements of the Modern Slavery Act 2015.

#### Our Policies

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. This Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and raises awareness to our employees including those who come into contact with our supply chain.
2. Business Management Code of Practice. This code explains the manner and expectations of contractors visiting Spectrum Safety Limited.
3. Health and Safety Policy and arrangements. This policy sets out the expectations of employees and agency employees whilst working for Spectrum Safety Limited.
4. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

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## Our Suppliers

Spectrum Safety Limited operates a supplier policy and maintains an Approved Supplier List within the requirements of ISO 9001 Quality Management System 2015. We conduct due diligence on all suppliers before allowing them to become an approved supplier. This due diligence includes an online search to ensure that an organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our agreement with approved suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our approved supplier process:

1. We may terminate the contract at any time should any instances of modern slavery come to light.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).

## Training

Internal training has been conducted to the appropriate purchasing team, so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

## Review

Supplier assessment is conducted at Management Review as part of our ISO 9001 Quality Management System. This review includes a review of supplier key performance indicators including compliance to the Modern Slavery Act 2015.

Key performance indicators include:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

<b>Policy Statement Approval</b>	
<b>This statement was approved by Simon Oldacre – Managing Director Spectrum Safety Limited</b>	
<b>Signature</b>	<b>Date 15.04.2019</b>
