

# SPEL PRODUCTS (The Company)

## ANTI SLAVERY AND HUMAN TRAFFICKING POLICY



### *Culture and Values*

The Company's culture and core values dictate that it adopts a zero tolerance attitude to slavery in any form.

### *Policy*

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the Act). This policy's use of the term modern slavery has the meaning given in the Act.

The Company is committed to opposing modern slavery in all its forms and preventing it by whatever means it can.

The Company adopts this policy with the intention of preventing opportunities for modern slavery to occur within its business and supply chain.

The Company will ensure that all its suppliers are notified of this Anti-Slavery policy and will endeavour to discover the measures they are taking to ensure that modern slavery is not occurring in their businesses. It expects its suppliers to hold their own suppliers to the same standards.

### *Responsibility for the Policy*

The Company's Directors have overall responsibility for ensuring that this policy is implemented.

Team Leaders are responsible for ensuring that those reporting to them understand and comply with this policy.

### *Reporting modern slavery or human trafficking*

The Company gives direct access to senior leadership to enable concerns about modern slavery to be reported. Reports will be investigated but the source will be kept confidential.

### *Communication and awareness of this policy*

The Company's zero tolerance to modern slavery will be communicated to its staff and all suppliers, contractors and business partners at the outset of any business relationship.

### *Review*

This Anti-Slavery Policy will be reviewed regularly and may be amended as circumstances dictate

B R Pocock – Managing Director

P S Pocock – Director

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*P S Pocock*

Date: 28<sup>th</sup>. June 2024