MODERN SLAVERY POLICY

Spot2Spot Ltd recognise that we have a responsibility to help prevent modern slavery in our industry. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Company has a zero-tolerance approach to any form of modern slavery and we are committed to acting both ethically and with integrity in all our business dealings. We are also committed to putting effective systems and controls in place to safe-guard against any form of modern slavery taking place within the business and/or our supply chain.

OUR POLICIES

The Company has policies in place which are regularly reviewed and we will ensure that systems and controls are in place to safeguard against any form of modern slavery taking place within our business.

The relevant policies include:

* Anti-slavery policy
* Recruitment policy
* Code of Conduct

OUR SUPPLIERS

We will conduct due diligence through an online search to ensure that a supplier organisation has never been convicted of offences relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Spot2Spot Ltd require our suppliers to confirm to us that:

* They have zero-tolerance towards slavery and human trafficking
* They will hold their own suppliers to account over modern slavery
* They will provide a copy of their Statement published under the Modern Slavery Act 2015 (if their turnover is £36m and above)
* If they are a UK based supplier, they must pay their employees at least the national minimum wage or national living wage
* They provide their employees with an employment contract; they do not withhold salaries for any reasons and they don’t require employees to surrender their passports or work permits as a condition of their employment.

TRAINING

This policy is published on the Company intranet and for newly recruited staff training will be provided at the induction stage.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Company’s slavery and human trafficking statement.

MATTHEW DAVISON

MANAGING DIRECTOR