

SPDSTUDIO
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Modern Day Slavery & Human Trafficking

Introduction

This statement sets out the Company's action to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are also free from slavery and human trafficking.

Organisational Structure and Supply Chains.

The organisation currently operates its business in the United Kingdom.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- All potential workers undergo a selection process which rigorously checks the Right to Work in UK.
- All payments made are equivalent to or more than the National Minimum Wage (NMW).

Responsibility

Responsibility for the organisation's anti-slavery initiative is as follows:

- Policies: HR further creates and manages the implementation of most policies across the business.
- Directors share accountability for assessing the risks.
- Investigations/due diligence: HR & Managers manage the process in line with the relevant policy.
- Training: All managers are briefed in this policy and it is fully adhered to in our recruitment process.

Relevant Policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- Whistleblowing policy: The organisation encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for all workers to make disclosures, without fear of retaliation.
- Employee code of conduct: The organisation's policies makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- Supplier Procurement code of conduct: The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and where necessary improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- Recruitment / Agency Workers policy: The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

The organisation undertakes appropriate due diligence when considering taking on new suppliers, and conducts reviews its existing suppliers, when appropriate. In addition, the organisation's due diligence includes:

- Evaluating the modern slavery and human trafficking risks of each new supplier where relevant
- Conducting relevant supplier audits or assessments which have a degree of focus on slavery and human trafficking where and if general risks are identified.

Training/Line Manager Briefing

The organisation requires its management to be aware of modern slavery. The organisation's modern slavery briefing covers:

- How to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation or how to use the whistleblowing policy
- What steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

If you need any further guidance or information, please contact HR department.