

 SPEAR-UK Ltd	QUALITY MANUAL QM-Modern Slavery Policy.docx	Issue Date	26/01/2019
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		Issuer	AJS
		Authorised By	NAP

SPEAR-UK policy with regard to the Modern Slavery Act 2015 is to operate in an atmosphere where fair employment practices and a safe workplace extend to every member of our workforce, and our values form our expectations of our employees and our suppliers.

SPEAR-UK policy objectives are:

1. Ensure all staff responsible for directly recruiting employees are aware of issues concerning labour exploitation.
2. Report any suspicions of hidden worker exploitation to the appropriate authorities, including the Police.
3. Ensure labour sourcing & recruitment are under the control of trusted and competent staff members.
4. Encourage staff members to report cases of hidden third-party labour exploitation and investigate and report appropriately.
5. Require labour providers and other organisations in the labour supply chain to adopt procedures consistent with this policy.
6. Accept job fees as a business cost and not allow them to be paid by applicants, no individual or organisation is to be used to source or supply staff without confirming that workers will not be charged a fee for finding work.

Due Diligence & Continuous Monitoring

We will monitor ethical standards across our business on a regular basis and part of this is through the supplier approval process which we aim to carry out before the commencement of supply.

In this approval process, under the section "Ethical Trading and The Modern Slavery Act 2015", we request a copy of the suppliers' statement regarding the Modern Slavery Act 2015. Although this does not form part of the Supplier Risk Assessment as it does not affect the safety of the product we are purchasing, the responses are viewed by a competent person (Company Director) and any action required, or further information is identified and requested.

Any issues identified are to be discussed by Senior Management and recorded at the regular (3-monthly) management meetings.

SPEAR-UK will monitor the effectiveness of this policy at Management Review Meetings whereby any reports received from employees, public or law enforcement agencies to indicate modern slavery practices have been identified.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, has been approved by the undersigned and will be reviewed annually.

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 Nick Philpott

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 Emily Swindley

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 Andrew Swindley

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 Naomi Riley



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History of Amendments/Revisions

Revision No.	Date	Revision Detail
001	14/06/2017	First Issue
002	26/01/2019	Company Name Change and rebrand

