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## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 March 2021.

S & P Spanarc Ltd ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

### Organisational structure

S & P Spanarc Ltd has business operations in the United Kingdom.

We operate in the Process Engineering sector, primarily as UK agents for foreign manufacturers. We also purchase goods from a small number of UK direct suppliers.

For more information about the Company, please visit our website: [spanarc.co.uk](http://spanarc.co.uk).

### Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

- Modern Slavery Policy. - It seeks to prevent Modern Slavery throughout our supply chain.

We make sure our suppliers are aware of our policies and adhere to the same standards.

### Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits.

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains.
- Monitor potential risks in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

### Risk and compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

- Evaluating the slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in France, USA and Australia in low-risk engineering industry.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will require that supplier to remedy the non-compliance.

### Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- We will contact suppliers to enquire about their modern slavery practices every 12 months.
- We will train our staff about modern slavery issues and increase awareness within the Company.

**Training our staff**

The Company requires its staff to complete training and ongoing refresher courses on slavery and human trafficking. The Company's training covers:

- What steps the Company should take if suppliers in its supply chain do not implement anti-slavery policies in high-risk scenarios, including their removal from the Company's supply chain.

The statement was approved by the board of directors.

A handwritten signature in black ink, appearing to read "Chris Guinane". The signature is fluid and cursive, with a large initial "C" and "G".

Chris Guinane, Managing Director  
Date 31-March-2021