



Spot-On-Supplies Group

Modern Slavery Policy

This policy deals with a number of aspects of the management of modern slavery and may be used to supplement any contractual terms relating to it.

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Overview

The Company is committed to ensuring the business and its supply chains are free of slavery and acknowledges responsibility to comply with all principles of the Modern Slavery Act 2015. We will perform due diligence to provide transparency throughout the organisation.

The Spot-On-Supplies group will not knowingly support or deal with any businesses involved in slavery or human trafficking. We are satisfied from our own due diligence that there is no evidence of any act of modern day slavery or human trafficking within our organisation.

The slavery act applies not only to our own employees but also to suppliers, sub-contractors and other business partners. There is corporate commitment to legal compliance, ethical standards and fundamental human rights.

Commitments

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.

Consistent with our risk based approach we may require:

- employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.

If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

Senior Management will take responsibility of implementing this policy and its objectives and will provide the necessary resources to ensure that its practices are effective in ensuring that modern day slavery is not taking place.

This policy may be amended at any time at the Company's discretion.