

SPRING MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT & POLICY

November 2017

PURPOSE: to provide reassurance to clients and suppliers that this Company has and will continue to take steps to meet its moral obligations in relation to the Act even though the Company does not fall within the scope of the Act due to its turnover being below the stated threshold (£36m).

LEGAL CONTEXT: MODERN SLAVERY AND HUMAN TRAFFICKING ACT 2015

MORAL CONTEXT: Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. A full definition of modern slavery can be found at the following UK Government website:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc_A_practical_guide_final.pdf

RELEVANCE TO OUR COMPANY: Many of our Clients are large organisations, some with global reach. Most fall within the scope of the Act that requires them to publish a 'statement' every financial year. The Act specifically states that the statement must include 'the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business'.

The relevance to this Company is that we are part of our Clients' supply chain and therefore must respond to any call for confirmation that we have addressed this issue and to that end supply a statement of the steps we ourselves are taking.

Our response needs to take the form of a Statement describing how we create and maintain awareness of the issue when working with Clients and Suppliers. It must also confirm that our business model is ethical and has no recourse to modern slavery or human trafficking. The following statement shall be referenced in the event of a client or supplier requesting sight of our compliance with the Act.

THE STATEMENT: "Spring CCR Ltd is a company operating below the turnover threshold requirement of the Modern Slavery and Human Trafficking Act 2015. However our clients typically fall within the scope of the Act and we are part of their supply chains. Consequently and consistent with our ethical approach to doing business, we bring the issue of modern slavery to the attention of our staff including Associates. A policy is in place that explains the context and application of the Act and outlines the actions that a member of staff must take in the event of identifying or suspecting a case of modern slavery and or human trafficking in the course of doing work with clients and suppliers. Furthermore our business model has no need for low paid workers



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as the nature of the work requires experienced, qualified executives who are paid well in excess of minimum wage rates.”

APPLICATION OF THE ACT RELEVANT TO YOU: It is clearly possible that we might be asked to deliver services to potential or existing clients who, perhaps unknown to us, fall foul of the Act. Example: a large agricultural producer Client, who might engage us to train their management, could be employing workers with conditions that are considered unlawful under the 2015 Act.

However unlikely, it is also possible that a member of this Company identifies or suspects a case of modern slavery during the course of their interactions with Clients or Suppliers. Therefore, in this event and in order to maintain our ethical approach to business, it is important that all staff and associates have a procedure to follow as below:

THE PROCEDURE: On identifying or suspecting a case of modern slavery and or human trafficking:

YOU must:

- Make a note of the facts as you experience them
- Keep these notes entirely confidential until spoken with a Director
- Inform a Director of the Company as soon as possible

THE DIRECTOR must:

- Follow an appropriate course of action as proposed in the Government publication ‘Transparency in Supply Chains – A practical guide’ and specifically section 9 ‘Responding to an incidence of modern slavery’ available on the link below:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc__A_practical_guide__final_.pdf
- Keep a record of the event.

End.

