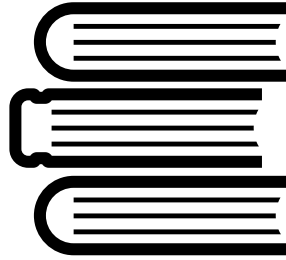




Company Policies



MODERN SLAVERY POLICY

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Reviewed: Annually or when new industry guidelines are issued.

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MODERN SLAVERY POLICY

Spook recognises that we have a responsibility to prevent modern slavery and human trafficking both within our business and our supply chain, as slavery and human trafficking are abuses of a person's freedoms and rights and there is no place for forced labour and exploitation in any of our operations.

Document main areas:

- Introduction
- Code of Conduct
- Whistle Blowing
- Supplier Scrutiny
- Due Diligence
- Training and Expectation

Introduction

Spook is a small employer and as such has an excellent opportunity to hold the highest of standards in terms of recruitment of employees and setting business relationships with suppliers to our business. We ensure we scrutinise the backgrounds of employees and applicants to any positions within Spook and set out a number of principles we expect our suppliers to comply with.

Code of conduct

We insist that all employees shall be free to choose their employment and shall not be forced to work against their will, and that there shall be no forced, bonded or involuntary prison labour or human trafficking. For our employees, failure to comply with the provisions of this may result in disciplinary action which could result in their immediate suspension or the termination of their employment.

Whistle blowing

We operate a whistle blowing policy, aimed at our employees, which encourages them to report any wrongdoing, including human rights violations such as modern slavery or human trafficking. Any reports of this nature will be fully investigated and appropriate remedial actions taken.

Supplier scrutiny

We are fortunate that our suppliers are some of the biggest and well know organisations in their industries. However, we believe that transparency is vital to a successful business relationship with our suppliers. We are committed to building long-term relationships and value open and honest communication with them. In the event of non-compliance with our standards, we expect our suppliers to be committed and engaged in remedying the issue within a time frame set out in a corrective action plan to be agreed. We reserve the right to terminate any agreements should a supplier decide that compliance with our expectations is impossible or where a supplier shows repeated disregard for the provisions of our standards.

> **New strategies - employees**

As we develop our new strategies with regard to modern slavery we will review our policies, procedures and the expectations we set for our employees.

> **New strategies - supply chain**

Our supply chain is relatively small. However, our suppliers range from small family run businesses to some of the largest organisations in their industry sectors. Many will themselves be reliant on their own supply chain, potentially across many countries and jurisdictions. We review any new strategies our suppliers undertake to ensure they do not compromise our expectations.

Due diligence

By being a small employer we have optimum control of the work environment, including labour scheduling and pay rates, thus reducing the risks and negating modern slavery within our own business.

We recognise however that no business can be risk free. In an effort to negate our exposure to modern slavery practises we engage with all our employees to raise awareness through interviews, reviews and appraisals. All employees and interviewees are expected to be scrutinised by the founding directors of Spook, which ensures due diligence is applied from director level downwards.

Training and expectation

More detailed training is likely to form part of our new strategy on modern slavery. In the following years we will undertake an extensive awareness raising strategies including formal communications plans for all employees via our internal personnel reviews.

For more information regarding this policy please [contact us](#) and we will address each query accordingly.

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