# Modern Slavery Statement



#### Statement

Spex UK Limited is committed to preventing modern slavery and human trafficking in its operations and supply chains. We uphold the highest ethical standards and strive to ensure that our business practices do not contribute to any form of modern slavery.

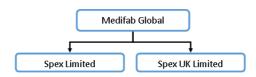
We do not have an annual turnover above £36m, so therefore are not required under this legislation to produce a yearly statement. However, we choose to voluntarily produce a statement.

#### **Our Business**

Spex UK Limited is focused on making a positive difference to lives of people with a disability, therapists and carers globally by providing leading edge postural support solutions for a wide range of special needs.

Spex UK limited is part of a global entity that has operational sites in 5 countries and approx. 180 employees. Our supply chains include our main manufacturing site in NZ, global subcontractors including Vietnam and Malaysia and 3<sup>rd</sup> Party Logistics in Belgium, UK and America.

Organisation Structure:



## **Our Policies**

We have implemented several policies to combat modern slavery and human trafficking, including but not limited to:

- 1) **Employee Code of Conduct**: Our Code of Conduct outlines our commitment to ethical business practices and the standards we expect from our employees.
- 2) **Supplier Code of Conduct:** This code sets out the standards we expect from our suppliers, including adherence to laws and regulations related to modern slavery and human trafficking.
- 3) Whistleblowing Policy: We encourage employees, suppliers, and other stakeholders to report any concerns related to modern slavery or human trafficking. Reports can be made anonymously and without fear of retaliation.
- 4) Youth Workers Policy: We recognise the unique value and potential challenges associated with employing young people and are dedicated to providing a safe, nurturing work environment that promotes their growth and development.
- **5) Migrant Workers Policy:** This policy sets forth our organisation's commitment to ensuring fair, ethical, and lawful treatment of all migrant workers.



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6) Ethical Procurement and Supply Chain Management Policy: The purpose of this policy is to establish a framework for identifying, preventing, and addressing risks of modern slavery within our procurement and supply chain operations.

### **Due Diligence Processes**

We are mindful that modern slavery could occur in our own business, local or international contractors as well as our contract manufacturers.

We have established robust due diligence processes to identify and mitigate the risks of modern slavery in our operations and supply chains:

- **Risk Assessment:** We regularly assess the risk of modern slavery in our business operations and supply chains, focusing on high-risk areas and suppliers. Based on our assessment, the overseas manufacturing sector presents our highest risk for modern slavery within our supply chain. We annually review our suppliers against the Global Slavery Index to review trends and take necessary action for any country with a prevalence of >5/1000.
- **Supplier Audits:** We conduct audits of our suppliers before selection to ensure compliance with our standards and identify any potential issues related to modern slavery.
- **Employee Training:** We provide training to our employees on modern slavery and human trafficking to raise awareness and ensure they understand their role in preventing it.
- **Plan for Remediation:** We follow the guidelines provided by Walk Free and CIPS on actions when cases of modern slavery are identified.
- Key Performance Indicators: 100% of Suppliers have Modern Day Slavery Policies and Procedures in place. Onsite Audits have zero findings in relation to ethical employment practices. All Countries we procure from have less than 5/1000 prevalence according to the Global Slavery Index. 100% of staff trained in Modern Day Slavery policies and procedures and how to spot and report.

## **Our Commitment**

Spex Limited is committed to continuous improvement in our efforts to combat modern slavery. We will regularly review and update our policies and practices to ensure their effectiveness.

Frederick Mascull CEO and Board Representative - Spex Limited December 2024

