

Spartan Services UK LTD
Modern Slavery and Human Trafficking Statement
1st April 2021

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1st April 2021 to 31st March 2022.

The statement sets down Spartan Services UK LTD's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Spartan Services UK LTD which are as follows:

Provision of Security, Medical and Consultancy Services.

The Company currently operates in the following country:

United Kingdom

Spartan is not to have deemed any services which would be at high risk of modern slavery or human trafficking.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 **Dr Daniel Howden** is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of Spartan Services and its clients.
- 1.2 **Daniel Warwick** is responsible for risk assessments in respect of human rights and modern slavery.
- 1.3 **Dr Daniel Howden** is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to annually complete e-learning on modern slavery and human trafficking.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations

- 2.1 **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Employee** - The Code of Conduct sets down the actions and behavior expected of employees when representing the Company.
- 2.3 **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises [how we manage our environmental impacts and] how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all staff to have completed training on modern slavery.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The management team endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Dr Daniel Howden

Position: Managing Director

Date: 1st April 2021

Signature: *Dan Howden*