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# **Modern Slavery Act 2015 Slavery and Human Trafficking Statement**

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# Introduction

Spill Defence Ltd, is committed to the continuous improvement of our practices to combat slavery and Spill Defence Ltd, is committed to the continuous improvement of our practices to combat slavery and human trafficking. Spill Defence team members are responsible for being aware and alert to the risks of forced labour and human trafficking in our business and our supply chain and are expected to report concerns to our management, which is expected to act upon them.

## Business and Organisational Structure

Spill Defence Limited, a company organised under the laws of England and Wales (company number 07339577), with its head office located in Rotherham, England.

## Our Supply Chains

Our key supply chains involve procuring a wide variety of goods and services. Our suppliers are often well established and have a history of responsible trade with Spill Defence Ltd. The evaluation and selection of suppliers for Spill Defence's supply chain is based on the supplier's ability to provide goods that meet the required technical specifications as well as the need for satisfactory quality and service performance. These requirements are necessary to satisfy the movement of goods through the supply chain to fulfill Spill Defence's own customer expectations.

## Our Policy on Slavery and Human Trafficking

This anti-slavery policy reflects our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to help ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## Due Diligence Processes for Slavery and Human Trafficking

Our goal is to build long standing relationships with suppliers in the U.K. and across the globe and regularly visit those suppliers and make clear our expectations of business behaviour. We expect these suppliers to have suitable anti-slavery and human trafficking policies and processes and conduct due diligence in their respective supply chains. As part of our induction program, new suppliers are required to disclose the programs and policies that are in place in their supply chain to combat slavery and human trafficking.

We encourage all of our team members and any other interested parties, including our suppliers, in all countries where Spill Defence physically does business (in both English and the local language) to encourage reporting of unethical or non-compliant behaviour.

We have zero tolerance for slavery and human trafficking in our business. In connection therewith, we have modified our terms and conditions of purchasing to require compliance with the Modern Slavery Act 2015, and provide for the immediate termination of the agreement in the event that we become aware that the supplier engages in any behaviour in violation of the Act.

## **Our Effectiveness in Combating Slavery and Human Trafficking**

Spill Defence Ltd reviews and develops its policies, procedures, systems and controls to help ensure ethical practices and effective compliance is present in all of its business operations. In addition to a review of the effectiveness of the steps we have taken to combat slavery and human trafficking in our supply chains, we plan to initiate the following further steps:

Continuing communication and personal contact with relevant team members within the purchasing organization to facilitate their understanding of, and compliance with, company expectations.

Reviewing and enhancing training available to the purchasing organisation to encourage further understanding of instances of modern slavery and human trafficking and compliance with the Modern Slavery Act 2015.

This statement has been approved by the Board of Directors of Spill Defence Limited and is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Spill Defence's slavery and human trafficking statement for the financial year ending December 31, 2017.

Dated: 03/08/2018