

## Anti-Modern Slavery and Human Trafficking Policy

### ARCTIC SPIRE

#### Our Commitment

We all have a responsibility to be alert to the risks of potential Slavery and Human trafficking activities however small, both in our business and in the wider supply chain. My expectation is that our staff raise any concerns they have and that we apply due diligence and act on any concerns raised.

We also must ensure that our suppliers are aware of our policies and promote the same high standards. Our anti-slavery statement reflects our commitment to acting ethically and with integrity in all our supply chain relationships and to ensuring that slavery and human trafficking is not taking place anywhere in our supply chains.

The UK Modern Slavery Act 2015 (the 'Act') requires businesses with an annual turnover of at least £36m to state the actions they have taken during the previous financial year to ensure modern slavery is not taking place in their operations and supply chains. Arctic Spire does not fall into this turnover category however, we feel strongly towards this and still have a responsibility regardless of our annual turnover.

#### Objectives

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The victims of modern slavery come from all walks of life and can be found all over the globe. The International Labour Organisation estimates that in 2016 40 million people globally were victims of modern slavery. This policy sets out how Arctic Spire aim to prevent opportunities for modern slavery to occur within the Company or any areas of our supply chain.

#### Key Contacts

We aim to work in partnership with all our contractors, suppliers and other business partners to ensure that they share and work towards our opposition to slavery and human trafficking. To manage this, as part of our contracting processes, we include specific prohibitions on the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our suppliers to hold their own suppliers to the same high standards. We evaluate all new suppliers with respect to modern slavery and human trafficking risk.

#### Scope

This policy applies to all Arctic Spire employees as well as to all suppliers, contractors and business partners.

#### Organisation and Structure

Arctic Spire is an established IT system training provider and consultancy, dedicated to advising, designing, developing and delivering training solutions for our clients, primarily throughout the UK.

As a professional services business our supply chain is relatively limited. Given the nature of our supply chain, we do not deem any particular activities or countries in which we operate, as high risk in relation to modern slavery. Relevant Policies.

Arctic Spire operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

#### Whistleblowing policy

Arctic Spire is committed to operating business in an open and accountable way. We encourage our employees, customers and business partners, to come forward and voice concerns about any aspect of our work both in relation to our direct activities or our supply chains. We recognise that employees are often the first to realise that there may be something seriously wrong happening within the business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation.

#### Employee Code of Conduct

This policy provides guidance about how we strive to live our Company values and sets out how we expect our employees to behave and conduct themselves whilst at work. It also sets out what you can expect from us as an employer and highlights where you can find further information about work-related issues.

#### Supplier Code of Conduct

Arctic Spire is committed to behaving and acting in an ethical manner and tackling modern slavery and human trafficking. We expect our Suppliers to adhere to these standards and want to work with suppliers who share our values. The Supplier Code of Conduct sets out the standards and principles we expect from our suppliers, contractors and business partners.

#### Corporate Social Responsibility

Arctic Spire is committed to being a responsible business, both in how we work with our end-users, clients, employees and how we contribute to the wider community and the world around us. Our Corporate Social Responsibility policy outlines how we operate as a socially responsible company.

#### Due Diligence

Arctic Spire are comfortable from our due diligence that there is no evidence of modern slavery or human trafficking in our organisation.

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Should suppliers not meet our standards as set out in this policy and our code of conduct, we would invoke sanctions including the termination of the business relationship.

#### Training

All our staff are fully trained to ensure a high level of understanding of the risks of modern slavery and human trafficking in our organisation and our supply chains.

#### Performance Indicators

We will implement the following key performance indicators:

- ▶ Ensuring awareness of our whistleblowing procedures throughout the business.
- ▶ Reviewing our arrangements for undertaking due diligence.

#### Review

The policy and procedure will be periodically reviewed on an annual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by Arctic Spire's C.E.O on 02 March 2020.

E. Davies  
Chief Executive Officer

02 March 2020