Spirent Communications plc Slavery and Human Trafficking Statement (March 2019)

Statement under the United Kingdom Modern Slavery Act 2015 and the California Transparency in Supply Chains Act of 2010 (SB 657)

Spirent Communications plc ("Spirent") is a leading telecommunications testing company with subsidiaries and operations worldwide. Central to our identity is a commitment to corporate responsibility. We continually move toward increased transparency and accountability to the public with our corporate responsibility efforts, performance and vision for the future. We invite you to visit online at http://corporate.spirent.com/Corporate-Responsibility/Our_Policies to learn more.

It is within the above framework that we make this statement under the UK Modern Slavery Act 2015 and the California Transparency in Supply Chains Act (SB 657), which require us to disclose our efforts to eradicate slavery and human trafficking from our direct supply chain for the products we sell.

- 1. How we assess the risk of human trafficking and slavery in our product supply chain. We source and purchase substantially all of the products sold by our business. Contract manufacturers must disclose all manufacturing facilities intended to be used for production of Spirent's products. Key suppliers must complete a supplier evaluation survey. This assesses the suppliers approach on a broad range of matters such as working hours, freely chosen labor, child labor avoidance, humane treatment of staff and freedom of association. We also review our contract manufacturers own internal policies on matters related to human trafficking, child labor and slavery to assure ourselves of each suppliers own commitment in this area.
- 2. How we audit compliance. We require that all factories intended for production of our goods be assessed in accordance with our supplier evaluation survey prior to the commencement of production. Spirent's supply chain management team make regular visits to key suppliers to assess their overall performance against their contractual obligations. We do not use a third party to audit compliance.
- 3. Certifying materials in our products comply with the laws regarding slavery and human trafficking. We will periodically require contract manufacturers to certify that they have not used child labor or individuals subjected to human trafficking or slavery in the production of our products. Contract manufacturers are responsible for assuring that their vendors and suppliers are in compliance with the applicable terms of their contract with Spirent.
- 4. **Training & Our Ethics Policy.** We require all our employees to comply with our Ethics Policy which includes a specific prohibition on using forced or child labor. Guidance is given in our policy on how to escalate violations of the policy which employees encounter. Our supply chain management team are aware of the

need to ensure that our products are manufactured in environments which comply with our Ethics Policy. This awareness is reflected in the supplier evaluation assessment described above. This demonstrates to the key suppliers our commitment in this area. Our visits to the manufacturing facilities assist the supply chain team in assessing the environment in which our products are produced. Members of our supply chain management team who are directly involved in sourcing Spirent products from contract manufacturers undertake training periodically to help them identify risks of child labor, human trafficking and slavery.

Approved by the Board 5 March 2019