

SPIE UK MODERN SLAVERY STATEMENT 2017/2018

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by SPIE UK Limited and all its subsidiaries (“SPIE UK”) during the year ending 31 March 2018 to prevent modern slavery and human trafficking in its business and supply chain

Introduction

This statement sets out SPIE UK's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking within our own business and our supply chains. This statement relates to actions and activities during the financial year 1 April 2017 to 31 March 2018.

SPIE UK is absolutely committed to preventing slavery and human trafficking in our corporate activities and to ensuring our supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

The ultimate parent company of SPIE UK is SPIE SA, the independent European leader in multi-technical services in the areas of engineering services, communications systems and specialised energy services. SPIE UK provides energy, safety and environmentally focused solutions across multi-technical and support services from initial design, through installation, testing, commissioning to long term maintenance and facilities management. SPIE UK employs more than 3500 people from a network of regional offices throughout the UK.

SPIE UK is committed to ensuring that our suppliers and subcontractors adhere to the highest standards of ethics. As such, they are required to sign the SPIE “*Charter for Suppliers and Subcontractors of SPIE*” as part of our due diligence process. The SPIE Supplier Charter states that suppliers and subcontractors must not use any kind of forced or compulsory labour as defined by Conventions C29 of 1930 and C105 of 1957 of the ILO (International Labour Organisation). Forced or compulsory labour means all work or service exacted from any person under the menace of any penalty and for which said person has not offered him/herself voluntarily (deemed to include human trafficking and modern slavery).

Within the SPIE Supplier Charter, SPIE UK also expects our suppliers and subcontractors to implement the necessary procedures to ensure that these principles are conveyed to their own suppliers and subcontractors. Any serious or deliberate failure by a supplier or subcontractor to observe the principles set out in the SPIE Supplier Charter may lead to its exclusion from our panel of suppliers and subcontractors.

Relevant internal policies

SPIE UK operates the following policies that highlight our commitment to the identification and prevention of unethical activities within our organisation (including human trafficking and modern slavery):

- **Whistleblowing policy** – SPIE UK encourages all its employees and other workers engaged through third party arrangements to confidentially report any concerns of unethical or illegal conduct within the organisation. This is deemed to include any circumstances that may give rise to an increased risk of human trafficking or modern slavery. The responsibility for the Whistleblowing policy lies with the Chief Executive Officer; and

- **Principles of Business Ethical Conduct** – this is a SPIE Group policy that applies across the whole of SPIE and all SPIE UK employees and workers are required to agree to comply with this code of ethical conduct on joining the organisation. This code states “SPIE complies strictly with human right laws prohibiting child labour and forced labour, any form of discrimination and the use of any illicit work” (deemed to include human trafficking and modern slavery). Any instances of non-compliance will be investigated and subject to disciplinary action where necessary.

SPIE UK will ensure its suppliers are aware of these policies and of the high standards that they are required to adhere to.

Ethics Committee

Further highlighting our commitment to the prevention of unethical business conduct, SPIE UK operates an internal Ethics Committee, consisting of the Chief Executive Officer, Finance Director and Legal Director & Company Secretary. The committee would be informed in the event of any concerns of human trafficking or modern slavery risks.

In 2003, SPIE Group pledged to support the United Nations Global Compact, which asks companies to embrace, support and enact, within their sphere of influence a set of core values in the areas of human rights, labour standards, the environment and anti-corruption.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures which are designed to:

1. establish and assess areas of potential risk in our business and supply chains;
2. monitor potential risk areas in our business and supply chains;
3. reduce the potential risk of slavery and human trafficking occurring in our business and supply chains; and
4. provide adequate protection for whistleblowers.

Future Activities

[In response to the introduction of the Modern Slavery Act 2015, SPIE UK has reviewed our internal policies and procedures and intends to introduce the following initiatives during the financial year 1 April 2018 to 31 March 2019:

- all new employees, where appropriate, are currently required to attend an internal ethics training course and this will in future cover the identification and prevention of forms of forced or illegal labour (including human trafficking and modern slavery);
- all current employees, where appropriate, will undertake a Modern Slavery update training course on an annual basis;
- an internal awareness programme will be introduced in 2018 which will include the distribution of email and poster communications across all office locations. These communications will include the basic principles of the Modern Slavery Act 2015, the identification of potential risks and the methods of reporting any concerns; and

- a review of the new supplier due diligence process and supplier terms and conditions to ensure these are consistent with the Modern Slavery Act.

Approval

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes SPIE UK's slavery and human trafficking statement for the financial year commencing 1 April 2017 and ending on 31 March 2018 This statement has been approved by the Ethics Committee of SPIE UK, which will review and update it annually.

Chief Executive Officer's signature:

A handwritten signature in black ink, appearing to read 'Robert Goodhew', written in a cursive style.

Chief Executive Officer's name: Robert Goodhew

Date: 23rd April 2018