



Spellman UK Modern Slavery Act Transparency Statement

Introduction

This Modern Slavery Act Transparency Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Spellman High Voltage Electronics Limited have facilities in Pulborough and Southwater, West Sussex, UK where we manufacture high voltage power supplies.

This statement sets out the actions of Spellman High Voltage Electronics Ltd to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2024 to 31 March 2025.

Compliance is the backbone to all our management systems. Therefore, we not only ensure we comply with all the UK Legal requirements, but we will also comply with Legislation from other countries that significantly affects our customers.

Spellman High Voltage Electronics Ltd are committed to upholding the highest standards of ethical conduct. We recognise that only by acting with honesty and integrity, can we work effectively and develop trusting, long-term partnerships with our customers and vendors.

We abide by the laws of all countries in which we do business, and we strive to be a positive force in all communities and environments affected by our business practises.

We are committed to carrying out due diligence to eradicate all forms of Modern Slavery & Human Trafficking in our supply chain. As documented in our Prevention of Modern Slavery and Human Trafficking Procedure, we align with the guidance and ideals set in the EcoVadis & Responsible Business Alliance ("the RBA") Standards for labour, ethics, health, safety, and environmental practices as well as the ISO 45001, 14001 & 9001 standards.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

HSE Advisor:

The HSE Advisor is responsible for ensuring our prevention of modern slavery and human trafficking procedure is regularly reviewed and continuously improved as required.

HR Manager:

The HR Manager is responsible the SHVUK Code of Conduct and Employee Handbook are regularly reviewed and continuously improved as required and to ensure all staff are trained against the code of conduct.

Supply Chain Manager & Quality Manager:

The Supply Chain Manager and Quality Manager are responsible for ensuring all applicable procedures are carried out effectively, regularly reviewed and continuously improved as required.

They are responsible for identifying potential risks of modern slavery and human trafficking in the supply chain through effective monitoring and will forward on copies of reports with supporting



evidence to the HSE Advisor, HR & Managing Director if Human Trafficking or Modern Slavery is suspected. To enable appropriate action to be taken.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. All Spellman staff have access to the Hub on Share Point which gives access to the Spellman Global Ethics Hotline and Spellman Lighthouse Anonymous Reporting.

Employee Code of Conduct

Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. Training is given to all employees to confirm they have reviewed and understood the content of our code of conduct.

Supplier/Procurement code of conduct

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

Recruitment/Agency workers policy

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency it is using before accepting workers from that agency. All new starters go through the recruitment checks to ensure they are legally permitted to work within the UK. All new starters are given a copy of the Spellman Employee handbook & SHVUK Code of conduct, so they fully understand their rights owed towards them and what is expected of them regarding standards and conduct of behaviour

Due diligence

We undertake due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. Our due diligence and reviews include:

- conducting supplier audits or assessments
- creating an annual risk profile for each key supplier
- requesting key suppliers sign a supplier manual which outlines our requirements to align with our code of conduct and the code of conduct of the RBA.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through and requiring them to implement action plans
- raising corrective actions requests against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct which if not addressed would result in the termination of the business relationship.



Training

We require all Spellman UK staff to complete training on human trafficking and modern slavery as part of our Code of Conduct policy training.

Our training covers:

- what is human trafficking
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation

Approval Signature:

Signed by:

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Neil Hogan
Managing Director

Date: 14 October 2025