Spring Solutions Modern Slavery and Human Trafficking Statement

Introduction

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015. It sets out the steps taken by Spring Solutions to prevent modern slavery and human trafficking in our operations and supply chains.

Spring Solutions is committed to operating within an ethical framework, as outlined in our Ethics & Corporate Responsibility Statement. That policy is built on three pillars: promotion of human rights, environmental consideration, and working against corruption.

This Modern Slavery Statement builds directly upon the promotion of human rights pillar, which commits us to ensuring that we do not use, directly or indirectly, forced or child labour and that we uphold the requirements of the Modern Slavery Act across our operations and supply chain.

Our Business and Structure

Spring Solutions operates provides products and services to clients across the UK and internationally. Our Ethics & Corporate Responsibility Statement guides how we conduct business, embedding respect for human rights and compliance with relevant legislation into our corporate culture.

Policies on Modern Slavery

Our approach to modern slavery is underpinned by the following policies and commitments:

- Ethics & Corporate Responsibility Statement – includes explicit commitments to:
  - Provide safe and healthy working conditions, in line with UK law.
  - Guarantee freedom of association and ensure non-discrimination.
  - Prohibit the use of forced or child labour.
  - Uphold the Modern Slavery Act requirements in both our own companies and within our supply chain.

- Supplier Terms & Conditions of Purchase (specifically section 24) – requires all suppliers to operate in compliance with the Modern Slavery Act, international labour standards, and our ethical expectations.

- Anti-Corruption Standards – recognising that unethical practices such as extortion and bribery can exacerbate vulnerabilities to forced labour.

Due Diligence

Spring Solutions undertakes due diligence to identify and mitigate risks of modern slavery in line with our human rights commitments:

- Requiring suppliers to confirm compliance with our Ethics & Corporate Responsibility Statement and the Modern Slavery Act.
- Taking corrective action or discontinuing relationships where non-compliance is identified.

Training and Awareness

Aligned with our commitment to "working against corruption" and "promotion of human rights," we:

- Provide training to employees to help them identify the signs of modern slavery and respond appropriately.
- Communicate our zero-tolerance stance to contractors and suppliers.
- Encourage confidential reporting of concerns regarding unethical labour practices.

Effectiveness and Key Performance Indicators (KPIs)

To measure the effectiveness of our approach, we monitor and report on:

- Supplier compliance with our Ethics & Corporate Responsibility Statement.
- Results of audits and reviews of supply chain partners.
- Reports or incidents of concern raised through our reporting channels.
- Continuous improvement actions taken to strengthen protections against modern slavery.

Commitment Going Forward

Spring Solutions is committed to continually strengthening its approach by:

- Expanding due diligence across more of our supply chain.
- Enhancing employee and supplier training.
- Reviewing and updating both this Statement and our Ethics & Corporate Responsibility Statement annually to ensure alignment with evolving best practice and regulatory requirements.

Approval

This statement has been approved by the Board of Directors of Spring Solutions on 17th of March 2025. It will be reviewed and updated annually.

MARC HALL
MANAGING DIRECTOR
Spring Solutions
Date: 17TH MARCH 2025