

Modern Slavery Policy

Ver: 2.0

Date: 19th January 2024

For the published version of our Modern Slavery Policy, please direct your attention to <https://corporate.spinwellglobal.com/anti-slavery-human-trafficking-policy/>

Anti-Slavery & Human Trafficking Policy/Modern Slavery Policy

Introduction

This statement is made on behalf of Spinwell Global Ltd pursuant to the section 54(1) of the Modern Slavery Action 2015 and comprises our slavery and human trafficking statement.

Our Business

We manage our business through a mixture of Work-From-Home Employees and an Office, both of which are primarily focussed on providing Contingent Labour to Central Government of the UK via Frameworks created by Crown Commercial Services. We have a number of separate clients all of which run process-based recruitment programs

Our Supply Chains

Our supply chains include PSC's or Umbrella companies which are chosen by the supplied contractor plus outplacement of certain other routine candidate databases and search tools that are commoditised in nature. These companies are all UK based.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and in our supply chains.

Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify risk, and mitigate against such risks, we nominate senior representatives of the business units and functions, who in turn report to the Director of ESG

We have in place systems across our business; our trading partners; and our supply chains to :-

- Identify inappropriate employment practices.
- Identify and assess other potential risk areas.
- Mitigate the risk of slavery and human trafficking occurring.
- Monitor potential risk areas.
- Protect whistle-blowers.

Supplier Adherence To Our Values And Ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we operate in line with principles of responsible sourcing, including paying employees at the prevailing minimum wage applicable within their relevant area of operations.

We have in place a supply chain compliance programme that is maintained by the relevant account manager or relevant management. This consists of client reviews; audit; and self-certification declarations.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, in our supply chains and in our business partners, we provide relevant training to our staff. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31st December 2021 and was approved by the Board of Directors of Spinwell Global Ltd on 15 January 2021.