



# MODERN SLAVERY STATEMENT - SPKTRAL LIMITED

UPDATED 1 JAN 2023

This statement is made on behalf of Spktral Limited, registered in England and Wales, subject to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022.

## Our business and ethics

This statement has been published in accordance with the requirements of section 54(1) Modern Slavery Act 2015 (the Act). It sets out the steps taken by Spktral Ltd during the financial year to ensure modern slavery and human trafficking, collectively referred to as “modern slavery” in this statement, is not taking place in any part of our business or any of our supply chains and the effectiveness of such steps.

## Our footprint

Spktral Limited is consultancy firm supplying pay gap analysis and action planning to organisations within the UK. We are a limited company registered in England and Wales (12194589) and are owned by a mix of founder/investors. We all work remotely around the UK, and we currently have three employees and three non-executive directors.

## Our supply chain

Our supply chain covers the procurement of goods and services to support the operations of our business and the delivery of services to our clients. These fall into the following categories:

- IT – hardware, software and development, including hosting;
- Telecommunications;
- Business support services (mainly cloud-based applications);
- Recruitment agencies;
- Professional services including lawyers and other SMEs.

All of our suppliers have centres of gravity within the EEA or North America.

## Relevant internal policies

The internal policies that deal with this subject are our:

- Supplier selection policy;
- Executive/Non-Executive Director Agreements; and
- Employee/Contractor contracts.

These policies are available across our business and are reviewed annually by the executive team.

### **Due diligence process**

When selecting a supplier, we conduct a simple risk assessment by asking the following questions:

- Is the supplier based (or performing services) outside of the EEA or North America;
- Does the supplier utilise material amounts of unskilled labour (*prima facie*); and
- Is the supplier: manufacturing, food processing, constructing, warehousing or providing security/cleaning services?

We carry out this process for all our suppliers and depending on the answers, we categorise them in one of two ways:

### **Minimal risk**

- All questioned were answered: No.
- Modern Slavery Statement was available if required; and
- This statement or another source describe their due diligence regarding their supply chain.

### **Tangible risk**

- If any of the answers are: Yes, then further due diligence is carried out to gather more evidence. If the information provided by the supplier is opaque and/or if it obfuscates the truth, then the decision to use/reject them is escalated to the board. We have not encountered such a supplier so far.

### **Continuous improvement**

We are still a very small team, but one of the functions of the management is to provide the board with a summary of any risks identified within the company and our supply chain regarding modern slavery. We changes are required, they are made quickly and efficiently.

### **Our current risk level**

During the financial year ending 31 December 2022 we were not aware of any incidents or allegations of modern slavery, nor any specific risks or concerns regarding any element of our supply chains.

### **Training**

As we are a very small team, we have not yet implemented a training programme. However, this item will remain on our growth chart as we increase in size and reach over the coming financial year.

### **Summary**

The board and investors of Spktral Limited have a zero tolerance policy for many egregious practices – modern slavery is a very real issue that we will call out wherever we see it.