

## **SPRA CONFLICT OF INTEREST POLICY**

*Last revised Feb 2020*

### **Introduction**

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At SPRA, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operation and supply chain.

This Policy applies to all Direct Contacts with SPRA including and not exclusive of; members, people going through training, freelancers working on behalf of SPRA, directors and board members.

### **Our Business and Supply Chains**

SPRA establish a relationship of trust and integrity with all our Direct Contacts, which is built upon mutually beneficial factors. Our supplier selection and auditing/recruitment procedures include due diligence of the supplier's reputation, respect for the law and compliance with health, safety and environmental standards.

### **Policy**

SPRA operates the following policies for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy - we encourage all Direct Contacts, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.
- Code of Conduct - our code encourages Direct Contacts to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of Direct Contacts' conduct and ethical behaviour

### **Due Diligence**

SPRA conducts due diligence on all new members during membership audit and on existing suppliers at regular intervals. This includes:

- Requiring improvements to substandard practices
- Sanctioning suppliers and Direct Contacts that fail to improve their performance in line with our requirements

We require all Direct Contacts to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their Direct Contacts work voluntarily
- They don't require Direct Contacts to post a deposit/bond and don't withhold payment for any reasons