

Modern Slavery and Human Trafficking Statement 2015-16

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1 April 2015-31 March 2016.

The statement sets down Spirit Ventures' commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Spirit Ventures which are as follows:

- Spirit Ventures is a holdings company for a number of subsidiaries acting in different sectors.
- These sectors consist of training (First Response Training), accreditation (Advantage), hospitality (Spirit Hospitality) and construction (Spirit Construction).

The Company currently operates only in the UK.

High Risk Activities

The Company has determined, based on supplier size and complexity, that Spirit Construction presents the highest risk. It is not felt that our other subsidiaries currently pose high risks, due to the relative size and local location of their suppliers, and the fact that their suppliers do not tend to have links with entities outside of the UK and EU.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policies: The Managed Services Director is responsible for creating and reviewing policies. The process by which policies are developed is the creation of a working document, followed by approval by the Strategic Board.
- 1.2 Risk assessments: The Managed Services Director is responsible for risk assessments in respect of human rights and modern by a process of an annual evaluation of the business makeup and supply chains of each subsidiary.
- 1.3 Due diligence: The Managed Services Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires any staff engaged in identifying or dealing with suppliers to receive training facilitated by the Managed Services Director.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking

in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing Policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Group Code of Conduct** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we work responsibly with suppliers and local communities.
- 2.4 **Group Modern Slavery and Human Trafficking Policy** – This Policy details our approach to identifying modern slavery and human trafficking in our suppliers.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, and evaluating the modern slavery and human trafficking risks of each new supplier within high risk activities.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains, including requiring all relevant staff to have completed training on modern slavery, and the receipt of notifications or complaints of modern slavery or human trafficking activities in our supply chain.

There were no reported instances of staff not completing training, or of reports of modern slavery or trafficking in 2015/16.