

Modern Slavery & Human Trafficking Policy

This document is drafted as a formal **Modern Slavery Policy** for **SpaceAm Ltd**, compliant with **Section 54 of the UK Modern Slavery Act 2015** and incorporating the updated statutory guidance as of **January 2025**.

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Version: 2.0 (Review Date: January 2025)

Effective Date: 17 January 2025

1. Policy Statement

SpaceAm Ltd (the "Company") is committed to ensuring that modern slavery and human trafficking are not taking place within our business operations or any part of our global supply chain.

We maintain a zero-tolerance approach to all forms of modern slavery, including forced labour, servitude, human trafficking, and child labour. We are committed to acting ethically and with integrity in all our business dealings and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

2. Scope

This policy applies to all persons working for us or on our behalf in any capacity, including:

- Employees at all levels, directors, and officers.
- Agency workers, seconded workers, and volunteers.
- Interns, agents, and contractors.
- External consultants, third-party representatives, and business partners.

3. Definitions

The Company defines "Modern Slavery" in accordance with the **Modern Slavery Act 2015**, encompassing:

- **Forced or compulsory labour:** All work or service which is exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily.
- **Human Trafficking:** The arrangement or facilitation of the travel of another person with a view to that person being exploited.
- **Servitude and Slavery:** The status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised.

4. Responsibility for the Policy

4.1 Board of Directors

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

4.2 Management

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

4.3 Compliance Officer

The [HR Director/Compliance Lead] is responsible for the day-to-day implementation of this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures.

5. Supply Chain Due Diligence

Given the specialized nature of the aerospace and satellite technology sector, SpaceAm Ltd recognizes that our supply chain involves high-value components and global logistics. We manage these risks through:

- **Supplier Code of Conduct:** All suppliers are required to sign our Code of Conduct, which includes specific prohibitions against the use of forced, compulsory, or trafficked labour.
- **Risk Mapping:** We perform annual risk assessments of our Tier 1 and Tier 2 suppliers, focusing on geographical regions and industries known for higher risks of labour exploitation.
- **Audits:** We reserve the right to conduct (or commission third-party) audits of suppliers. In 2026, these audits include digital identity verification and payroll transparency checks.
- **Contractual Clauses:** We include specific "Anti-Slavery" clauses in our procurement contracts, allowing for immediate termination if a supplier is found to be in breach of the Modern Slavery Act 2015.

6. Recruitment and Employment Practices

To prevent the risk of exploitation within our own workforce, SpaceAm Ltd:

- **Right to Work:** Conducts rigorous "Right to Work" checks for all employees and contractors via the UK Government's digital verification systems.¹
- **Direct Payment:** Ensures all salaries are paid directly into a bank account held in the name of the employee.²
- **Agencies:** Only uses reputable recruitment agencies ³that are also compliant with the Modern Slavery Act 2015.

7. Training and Awareness

- Mandatory modern slavery training is provided to all staff involved in **Procurement, HR, and Supply Chain Management**.
- General awareness training is provided to all employees during their induction process to help them identify "red flags" and understand how to report concerns.

8. Reporting and Whistleblowing

We encourage the reporting of any concerns regarding modern slavery, however small.

- Employees may raise concerns through their line manager or via the **SpaceAm Whistleblowing Hotline** [Insert Number/Email].
- We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

9. Breaches of this Policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Approval

This policy was approved by the Board of Directors of SpaceAm Ltd on **17 January 2025**.

Signed: Christopher Isaac on behalf of the board.

[Name] Director, SpaceAm Ltd

Would you like me to draft a "Supplier Code of Conduct" to accompany this policy, or perhaps a formal "Modern Slavery Statement" for your website?
