

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement has been published pursuant to the requirements under section 54 of the UK Modern Slavery Act 2015 and the California Transparency in Supply Chain Act of 2010. It provides information regarding the business practices of Spectris plc, the holding company, its subsidiary companies, other companies within the Spectris group<sup>1</sup> (together, “Spectris”/the “Group”), and the steps Spectris has taken to ensure modern slavery and human trafficking (“MS&HT”) is not taking place in its business and supply chains.

Spectris has a zero-tolerance approach to any form of modern slavery or human trafficking. It is committed to acting ethically, with integrity and transparency in all business dealings and it is committed to implementing effective systems and controls to safeguard against any form of MS&HT in any part of its business or operations. The Group considers that the risk of MS&HT taking place within its business or supply chain is relatively low and to date we have not uncovered any evidence of MS&HT within our business operations.

### **OUR BUSINESS STRUCTURE AND SUMMARY OF OUR OPERATIONS AND SUPPLY CHAINS**

Spectris is a diverse business, with operations and employees in over 30 different countries. We provide customers with expert insight through our advanced instruments and test equipment, augmented by the power of our software and services. Spectris comprises business who are leaders in materials analysis, test and measurement and in-line sensing and monitoring solutions. Our businesses are aligned to technology driven end markets with strong fundamentals and secular growth drivers.

Our businesses are united by the same purpose, the same values and the same corporate strategy. They all work according to a strong common framework of controls, management KPIs, financial discipline and rigorous operating principles, but each business is focused on its own markets, customers and technologies.

We recruit, develop and promote our people based on their talent, commitment and achievement; we continuously endeavor to ensure that everyone is treated equally and fairly whatever their race, color, religion, national origin, gender, sexual orientation, age, disability or background. Spectris is a very specialized and technical business, and we rely on the skills and expertise of our people, many of whom are highly qualified engineers and technicians.

A summary of the businesses covered by this statement is below:

#### **Malvern Panalytical**

Malvern Panalytical is a leader in the advanced measurement and characterization of materials. The company provides best-in-class sensor technologies, insightful data science and domain knowledge. They create superior solutions to accelerate innovation and deliver greater efficiency in R&D and manufacturing.

#### **HBK**

HBK provides a strongly differentiated and integrated physical sensing, testing, modelling and simulation solution which helps customers create leading products and accelerate product

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<sup>1</sup> This statement sets out the steps taken by Spectris plc and the list of subsidiary companies set out in Appendix One.

development. By delivering reliable precision through technologies that integrate the physical and virtual domains, developers can gain unprecedented insight into their product data and processes.

### **Omega**

Omega is a market-leading, specialist, omni-channel sensor provider to process engineers. They provide a curated and differentiated product offering via a class-leading e-commerce platform. On 19 April 2022, Spectris announced the sale of Omega to Arcline Investment Management, with completion expected during 2022.

### **Industrial Solutions Division**

The Industrial Solutions division ('ISD') comprises a portfolio of three high-value, niche businesses: Particle Measuring Systems, Red Lion Controls and Servomex.

#### Particle Measuring Systems

Particle Measuring Systems specializes in particle counters that measure and monitor contamination levels in clean and controlled environments. With more than 60 patents, PMS create the technology that enables customers to make fact-based decisions, improve process yield and comply with changing regulatory requirements.

#### Red Lion Controls

Red Lion Controls manufactures a variety of industrial control products, from timers and counters to complex man-machine interfaces and has the latest surface mount and chip-on-board production capabilities. Red Lion's engineering team provides new product design both for a wide range of standard control products and as well as custom and OEM requirements.

#### Servomex

Servomex is a leading supplier of gas analyzers (for use in both hazardous and safe area applications) gas analysis systems and transducers, combined with a full range of customer support products and services.

### **Our Supply Chains**

Due to Spectris' diverse business activities, it has a diverse supply chain.

Spectris is committed to preventing MS&HT in its corporate activities, and to working with its supply chain to achieve this commitment. Spectris is committed to promoting responsible business practices with our suppliers as outlined in more detail below. Our objective is to build long-term shareholder value sustainably by supplying productivity-enhancing solutions and services for our customers. To achieve this we need a global high-performance supply chain.

Spectris has high standards of business conduct applicable to the whole organization. We govern the actions of our company and employees and hold them to the highest level of ethical and social accountability. Our goal is to work with suppliers who embrace and comply with the same principles as our own.

Spectris places high priority on compliance with the legislative and ethical requirements of the countries in which we operate, particularly with respect to employment practices, labor rights and equal opportunities. The Spectris plc HR Director has overall responsibility for employment policies, but responsibility for implementation is delegated to individual operating companies, with operational policies and procedures tailored to suit local needs. We have a Group personnel policy, which includes the induction/onboarding process and makes mandatory a walkthrough of the group Values and Code of Business Ethics, including whistleblowing policy and hotline, and our commitment to equality.

## **POLICIES RELEVANT TO MODERN SLAVERY AND HUMAN TRAFFICKING**

### **Our Business**

Although Spectris does not have a specific MS&HT policy, it has other policies and procedures in place which address its MS&HT compliance requirements and standards. Details of these policies are outlined here.

Spectris maintains and issues policies and guidance at a group level so that it can standardize and maintain oversight of the interactions that companies have with their suppliers. The Spectris plc Group Manual (the “Manual”) sets out the group wide policy which applies to Spectris. The Manual is available to all employees. In the event that local legislation prevents compliance with the Manual (which is expected to be rare), businesses are required to explain their non-compliance and proposed mitigating actions and ensure that they have a dispensation from Spectris plc in place. An annual sign-off is required on the year-end financial reporting package, together with a statement that all relevant information has been disclosed to the external auditors.

Wherever possible Spectris uses a standardized sourcing agreement which includes key principles and values expected of suppliers. The standardized sourcing agreement is then tailored to specific laws governing the jurisdictions in which the Spectris group companies operate.

Our Human Rights Policy is consistent with the Core Conventions of the International Labor Organization. Spectris aims to comply with internationally recognized human rights standards at all of our sites. We operate a number of additional internal policies to ensure that we are conducting business in an ethical and transparent manner. The internal policies include:

- Code of Business Ethics: Our Code of Business Ethics makes clear to employees the actions and behaviors expected of them when representing the organization. Our Code was updated in 2020 and includes specific safeguards against MS&HT. The Code also includes a robust approach to anti-bribery and corruption. The organization strives to maintain the highest standards of employee conduct and ethical behavior when operating abroad and managing its supply chain. We make our suppliers aware of the principles within the Code of Business Ethics and the standards we expect of them. The Code of Business Ethics can be found [here](#). In 2021, Spectris undertook an all-employee survey to determine the effectiveness of the roll-out of the updated Code. Of all responders, 91% of staff responded positively to the question “I understand my company’s code or standards of business conduct” showing that the launch of the refreshed Code was effective and reached a high proportion of employees;
- Recruitment Policy: We operate a robust recruitment policy, including conducting checks on eligibility to work in order to safeguard against MS&HT. All our UK employees are also paid the National Living Wage, at a minimum;
- Procurement Policy: Individual operating entities conduct risk-based due diligence on their suppliers. In the event an instance of MS&HT comes to light, it is addressed, including the termination of the contract, where appropriate;
- Speak Up Policy: We encourage all workers, suppliers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organization. This includes any circumstances that may give rise to an enhanced risk of MS&HT. The organization's Speak Up procedure is set out in Our Code of Business Ethics and is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use the Spectris confidential helpline ([www.spectrishelpline.com](http://www.spectrishelpline.com)). The helpline can be used to report violations of the Code of Business Ethics including MS&HT in any Spectris entity and in any jurisdiction in which it operates. Concerns can be raised by filling out an online form or dialing the confidential helpline numbers found on the website; and



- Supplier Code of Conduct: Some operating companies implement a Supplier Code of Conduct where their suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect and act ethically and within the law in their use of labor. These companies work with their suppliers to ensure that they meet the standards of the Supplier Code of Conduct. Serious violations of the Supplier Code of Conduct will lead to the termination of the business relationship with the supplier.

### **Supply Chain Management**

We believe that suppliers, and other business partners, should have the opportunity to benefit from their relationship with us. In practice this means that we work together to minimize and manage business risk and improve business practices, through education, training and the sharing of good practice.

#### Supply Chain Management Policy

In addition to the above, our Supply Chain Management Policy outlines the requirements we have of our suppliers which include a commitment to:

- Uphold and demonstrate high standards of integrity, governance and business practice;
- Not employ workers under the school leaving age of the country of employment (other than in genuine apprenticeships);
- Not use forced or illegal immigrant labor (including modern slavery and human trafficking);
- Provide working conditions which meet Spectris' high standards on health, safety, hygiene and environmental practices;
- Pay wages and benefits which meet or exceed National Living Wage minimum requirements and adhere to working time regulations where applicable;
- Comply with Spectris' standards and procedures in relation to anti-bribery and corruption;
- Not deny access to, or apply unfairly, a transparent grievance procedure;
- Not use any form of unlawful discrimination, harassment, abuse or bullying;
- Not knowingly procure specified metals that originate from facilities in conflict regions as metals should be certified as "conflict free";
- Be equally demanding of their suppliers and be able to demonstrate compliance to all of the aforementioned requirements; and
- Provide equal business opportunities for diverse suppliers.

#### Additional measures

In addition to the above, we are progressively rolling out additional MS&HT prevention measures at Spectris entities, for example by including an express reference to the commitment to preventing MS&HT in their "Terms and Conditions for Purchase of Goods and/or Services", requiring suppliers to "*comply with all applicable laws relating to slavery and human trafficking including the Modern Slavery Act 2015.*"

### **DUE DILIGENCE AND SUPPLY CHAIN VERIFICATION, AUDITING AND CERTIFICATION**

In addition to due diligence processes, Spectris conduct on-site visits to investigate the specific operations of key suppliers. This allows Spectris to analyze a supplier's specific practices and procedures. Where risks are identified by our on-site team during these visits this may lead to further investigations and potentially a full audit. New and potential suppliers are made aware of the Spectris compliance framework.

### **RISK ASSESSMENT**

Spectris is committed to identifying and preventing all forms of MS&HT in our business and supply chain. To this end, we implemented robust risk assessment procedures. For example, one of our entities screens for public information on our key suppliers, using the cloud-based Risk-Management solution "Risk Methods." On-site visits and/or audits are undertaken. The Spectris DD toolkit is used for the evaluation of sales channel partners and the Dow Jones Risk Averter tool is used by some operating companies to verify and monitor them.

The Group has assessed its supply chain against the top twenty countries identified in the Global Slavery Index to assess the geographical risks of modern slavery and human trafficking in the Group's supply chain. Based on this assessment, the Group has focused attention on its manufacturing operations and key suppliers in South East Asia to ensure compliance with the SA8000 Social Accountability Standard (SA 8000). The Group has trained employees in the Spectris Asia Pacific supply chain to review and support compliance with SA8000 and key suppliers have been audited against the SA8000 standard by our auditors to ensure that they have attained the certification standard.

#### **MODERN SLAVERY & HUMAN TRAFFICKING TRAINING**

Spectris recognizes that all supply chain management staff within the organization working in all countries need to complete risk-based MS&HT training. Spectris does undertake regular refresher training on the Code of Business Ethics which includes training on fair employment, human rights and working with partners and suppliers. In 2021, comprehensive risk-based training was rolled out across Spectris.

#### **FUTURE STEPS/ ANY OTHER ACTIONS**

As part of our commitment to improving our procedures to identify and prevent MS&HT, a review of the Group's Human Rights policy will be undertaken in 2022 as part of a wider re-assessment of the social risk in the Group's operations and supply chain.

#### **APPROVAL**

This statement has been examined and approved by the Board of Spectris plc on May 26, 2022.

**Mark Williamson**  
Chairman  
Spectris plc

**Andrew Heath**  
Chief Executive  
Spectris plc

**Mark S. Fleiner**  
President  
Malvern Panalytical

## **Appendix One**

This statement relates to Spectris plc (UK Company Number 02025003) and the following subsidiary companies:

- Spectris Group Holdings Limited, incorporated in England and Wales (01104312)
- Concept Life Sciences (Holdings) Limited, incorporated in England and Wales (09046553)
- Malvern Panalytical Limited, incorporated in England and Wales (01020602)
- Red Lion Controls Inc., incorporated in Pennsylvania, US (300036 / 23-1888449)
- Hottinger Brüel & Kjaer GmbH, incorporated in Germany (HRB 1147)
- Hottinger Brüel & Kjær A/S incorporated in Denmark (CVR23958414)
- Particle Measuring Systems Inc, incorporated in Colorado, US (19871264849 / 84-0645631)
- Servomex Group Limited, incorporate in England and Wales (02170458).