MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31December 2023.

Neil Spence Photography Ltd. ('the Company', 'we', 'us' or 'our') is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational Structure

Neil Spence Photography Ltd. has business operations in the United Kingdom.

We operate in the photography, film, media, and education sector. The nature of our supply chains is as follows:

We work with a number of key direct suppliers who provide us with goods, such as photographic equipment and services such printing and processing.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner.

These include the following:

We adhere to local and national laws.

We agree with the right for workers to terminate employment.

We believe in the freedom of association.

Threats of violence, harassment and intimidation will not be tolerated.

We prohibit the use of worker-paid recruitment fees

We prohibit compulsory overtime.

We prohibit child labour.

We prohibit discrimination.

We prohibit confiscation of workers original identification documents.

We provide access to remedy, compensation and justice for victims of modern slavery.

We make sure our suppliers and customers are aware of our policies and adhere to the same standards.

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

- Internal supplier audits
- External supplier audits.

Our due diligence procedures aim to:

• Identify and action potential risks in our business and supply chains.

- Monitor potential risks in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

Risk and Compliance

The Company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

Evaluating the slavery and human trafficking risks of each new supplier. Reviewing on a regular basis all aspects of the supply chain based on supply chain mapping.

We do not consider that we operate in a high-risk environment because the majority of our supply chain is based in the UK and in low-risk industries such as photographic service or software services and products.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our procedures by any of our suppliers, we will seek to terminate our relationship with that supplier immediately.

Effectiveness

The effectiveness of this policy is to ensure a Zero Tolerance for all suppliers. This will be tracked throughout the next financial year.

This statement was approved by the director of Neil Spence Photography Ltd

Neil Spence