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SP Industries ("SP") is a manufacturer of specialty equipment, scientific glassware, laboratory and lab safety supplies, and home healthcare products. SP is headquartered in Warminster, PA and has international offices in Ipswich, United Kingdom and Barcelona, Spain. SP serves customers in California, the United Kingdom, the European Union, and across the world. Similarly, SP's suppliers are situated world-wide.

SP has implemented an anti-human trafficking program that complies with the requirements of the Trafficking Victims Protection Act (TVPA), the UK's Modern Slavery Act of 2015, and California's Transparency in Supply Chains Act of 2010. This program includes a company-wide policy, mandates onboarding and annual training, requires an annual audit of both its recruiting and procurement departments. Further, SP provides a process for reporting and remediating potential policy violations and maintains a zero-tolerance policy on retaliation. This policy applies to all SP's employees, contractors, suppliers, and vendors.

In 2020, as a baseline for its awareness program, SP will train its employees on its anti-human trafficking policy during their orientation process and the employee handbook contains a section on the company's anti-human traffic policy. SP also requires employees to participate in annual anti-human trafficking training. Employees responsible for (a) the recruitment and hiring of labor; and/or (b) the procurement and supply chain management will receive additional training on identifying red flags of possible human trafficking within supply chains.

SP will also evaluate both its recruitment program for employees and its supply chain for risks of human trafficking in the acquisition of goods and services. Now that SP has implemented its anti-human trafficking policy, it will require each contractor, supplier, and vendor to sign a Code of Conduct affirming the entity is not engaging any human trafficking. Going forward, each new subcontractor, supplier, and vendor will be required to complete a Code of Conduct during the procurement process. SP will conduct a risk assessment on each entity before entering an agreement.

Similarly, as SP is conducting due diligence on its supply chain, it is requiring its contractors, suppliers, and vendors to do the same. SP has asked each entity in its supply chain to conduct due diligence on its supply chain and affirm that no human trafficking violations are present. In the future, contractors, suppliers, and vendors will be required to complete this certification on an annual basis.

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#### Revision History

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#### REQUIRED APPROVALS

<b>AUTHOR and OWNER</b>
Rob Gardner, Corporate Quality Director/Quality Assurance
<b>HR REPRESENTATIVE</b>
Laura Pierce, Vice President- Human Resources/Human Resources
<b>QUALITY ASSURANCE APPROVAL</b>
Maria Malenfant, Documentation Manager/Quality Assurance

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