

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 and is Spectris plc's modern slavery and human trafficking statement for 2024. It provides information regarding the business practices of Spectris plc, the holding company, its subsidiary companies, other companies within the Spectris group¹ (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 direct supply chain is relatively low.

OUR BUSINESS STRUCTURE AND SUMMARY OF OUR OPERATIONS AND SUPPLY CHAINS

Spectris is a diverse business, with over 7,000 employees in more than 30 countries. We provide critical insights to our customers through premium precision measurement solutions combined with technical expertise and deep domain knowledge. Precision is at the heart of what we do - our leading, high-tech instruments and software equip our customers to solve some of their greatest challenges to make the world cleaner, healthier and more productive. Spectris is formed of two key divisions - Spectris Scientific and Spectris Dynamics, which are placed in technology-driven end markets, with strong fundamentals and attractive growth trajectories.

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 endeavour to ensure that everyone is treated equally and fairly whatever their race, colour, religion, national origin, gender, sexual orientation, age, disability or background. Spectris is a very specialised 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:

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

Spectris Scientific Division

Malvern Panalytical

Malvern Panalytical is a leader in the advanced measurement and characterisation 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.

Particle Measuring Systems

Particle Measuring Systems specialises 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.

Servomex

Servomex is a leading supplier of gas analysers (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.

Spectris Dynamics Division

HBK

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

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 stakeholder value 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 organisation. 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, labour rights and equal opportunities. The Spectris plc HR Director has overall responsibility for employment policies, but responsibility for implementation is delegated to individual businesses, with operational policies and procedures tailored to suit local needs.

POLICIES RELEVANT TO MODERN SLAVERY AND HUMAN TRAFFICKING

Our Business

Spectris has several Group wide policies 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 standardise and maintain oversight of the interactions that companies have with their suppliers. In the event that local legislation prevents compliance with Group policies and guidance (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.

Wherever possible Spectris uses a standardised sourcing agreement which includes key principles and values expected of suppliers. The standardised 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 Labour Organisation. Spectris aims to comply with internationally recognised 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 behaviours expected of them when representing the organisation. 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 organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain. The Code of Business Ethics can be found [here](#). In 2023, refresher training on the Code of Business Ethics was carried out across the Group.
- Third Party Policy & Procedures: mandates the standards and procedures that all employees shall follow to appoint, manage, pay and terminate any third parties that Spectris and its businesses engage;

- 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 organisation. This includes any circumstances that may give rise to an enhanced risk of MS&HT. The organisation'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 other stakeholders and third parties who have concerns can use the Spectris confidential helpline (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 dialling the confidential helpline numbers found on the website; and
- Supplier Code of Conduct: The Spectris Supplier Code underlines our commitment to ethical business practices and sustainable supply chains. The Supplier Code serves as the foundation of our operations, outlining the minimum standards we expect from our valued supply chain partners and how we would like them to work with us to fulfil our wider sustainability ambitions. The Code outlines our commitment to integrity, transparency, and responsibility and it provides a comprehensive framework that guides our interactions with suppliers and reinforces our core values of Own It, Be True and Aim High. The Supplier Code works in tandem with Our Code of Business Ethics, creating a robust foundation for our business practices. Our Code was published in December 2023. We are confident that by collectively embracing the standards in our Supplier Code with our supply chain, we will strengthen our global impact and reinforce our position as a leading, sustainable business.

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 aim to work together to minimise and manage business risk and improve business practices, through education, training and the sharing of good practice.

[Our Supplier Code of Conduct](#) outlines the requirements we have of our suppliers which include a commitment to:

- Uphold and demonstrate high standards of integrity, governance and business practice;
- Ensuring that all work is voluntary. Forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery or trafficking of persons is not permitted.
- Ensuring no unreasonable restrictions on workers' freedom of movement including the requirement to lodge deposits or identity papers.

- Providing all workers with clear and understandable information regarding their employment and all disciplinary matters must be appropriately recorded.
- Not employing any person under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is highest, save for the use of legitimate apprenticeships which comply with relevant laws and regulations;
- Verifying the age of workers using an appropriate process;
- Providing working conditions which meet Spectris' high standards on health, safety, hygiene and environmental practices;
- Paying wages and benefits which meet or exceed which meet or exceed national 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;
- Be equally demanding of their suppliers and be able to demonstrate compliance to all of the aforementioned requirements; and

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 analyse 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 to also supporting our supply chain in achieving the same goal. 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 "Sphera." 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 RiskCenter tool is used by some businesses 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 China and 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 the certified auditors to ensure that they have attained the certification standard.

MODERN SLAVERY & HUMAN TRAFFICKING TRAINING

Spectris recognises that all supply chain management staff within the organisation 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 on modern slavery and human trafficking was rolled out across Spectris to individuals who have direct contact with the Group's supply chain.

FUTURE STEPS/ ANY OTHER ACTIONS

Following the publication of our Supplier Code of Conduct, in FY2024, we will continue to refine and improve our procedures for the identification and prevention of MS&HT.

APPROVAL

This statement has been examined and approved by the Board of Spectris plc on 23 May 2024.

Mark Williamson
Chairman
Spectris plc

Andrew Heath
Chief Executive
Spectris plc

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)
- Malvern Panalytical Limited, incorporated in England and Wales (01020602)
- Hottinger Brüel & Kjaer GmbH, incorporated in Germany (HRB 1147)
- Hottinger Brüel & Kjaer 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).