

REPORT ON FORCED LABOUR AND CHILD LABOUR FOR SPECTRIS CANADA INC

This statement has been published pursuant to the requirements under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) and is Spectris Canada Inc.’s (with registration number 1169728640) (“**Spectris Canada**”) report under the Act for the year ended 31 December 2023 (the “**Reporting Period**”).

Spectris Canada is a wholly-owned subsidiary company within the Spectris Group (being Spectris plc, and its directly and indirectly owned subsidiaries). Spectris plc is registered in England under company number 02025003 and is listed on the London Stock Exchange and is also required to produce a similar statement meeting the requirements of the UK Modern Slavery Act 2015 and the California Transparency in Supply Chain Act of 2010. The statement made by Spectris plc, and a number of its subsidiaries, can be found at <https://www.spectris.com/assets/Modern-Slavery-Statement-2023-Final.pdf>

This report provides information regarding the business practices of Spectris Canada, which is required to operate in line with the policies, standards and practices that are set and adhered to by all companies within the Spectris Group. These policies support all of the companies within the Spectris Group to ensure that forced labour and child labour, as well as other forms of modern slavery, including human trafficking (“**Modern Slavery**”) are not taking place within its businesses and supply chains.

The Spectris Group, including Spectris Canada, has a zero-tolerance approach to any form of Modern Slavery. 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 Modern Slavery in any part of its business or operations. The Spectris Group considers that the risk of Modern Slavery taking place within its business or direct supply chain is relatively low.

OUR BUSINESS STRUCTURE AND SUMMARY OF OUR OPERATIONS AND SUPPLY CHAINS

The Spectris Group 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.

Spectris Canada Inc. is incorporated under the *Business Corporations Act* (Quebec) and is headquartered in the Province of Quebec. It is a corporation within the Spectris Group that is used to consolidate the trade names of Malvern Panalytical, Claisse, a sub-division of Malvern Panalytical, and Red Lion (which was divested from the Spectris Group on 2 April 2024). Under the Spectris Canada legal entity, these trade names operate sales offices, supply centres and the manufacturing and exportation of the Claisse products. Wherever necessary, the Group-wide procurement teams are utilised to support the running of the Spectris Canada business, and Spectris Canada adheres to the Group’s policies and procedures, as well as its Code of Business Ethics. Further details on policies and procedures relevant to the management of our supply chain can be found below.

Our businesses, including Spectris Canada, 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. The Spectris Group 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.

Spectris Canada had approximately 76 employees as at the end of the Reporting Period, all of whom were based out of Canada.

Our Supply Chains

Due to the diverse business activities of the Spectris Group, it has a diverse supply chain.

During the Reporting Period, Spectris Canada sourced its goods and services from approximately 250 suppliers, of which approximately 75% were located in Canada 20% in the U.S. and 5% worldwide. The categories of goods and services accounting for our highest procurement spend were chemical raw materials, precious metal (platinum) and instrument components.

Spectris Canada, as part of the Spectris Group, is committed to preventing Modern Slavery in its corporate activities, and to working with its supply chain to achieve this commitment. We are 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.

The Spectris Group 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.

STEPS TO PREVENT AND REDUCE RISKS OF MODERN SLAVERY

In general terms, Spectris Canada, as part of the Spectris Group, took the following steps during the Reporting Period to identify, prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- mapping supply chains;
- conducting an internal assessment of risks of Modern Slavery in our activities and supply chains;
- gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily;
- addressing practices in our activities and supply chains that increase the risk of Modern Slavery;

- developing and implanting due diligence policies and processes for identifying, addressing and prohibiting the use of Modern Slavery in our activities and supply chains;
- requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of Modern Slavery in their activities and supply chains;
- developing and implementing anti-Modern Slavery contractual clauses;
- auditing suppliers;
- monitoring suppliers;
- developing and implementing grievance mechanisms;
- developing and implementing training and awareness materials on Modern Slavery; and
- engaging with supply chain partners on the issue of addressing Modern Slavery.

POLICIES RELEVANT TO MODERN SLAVERY

Our Business

The Spectris Group 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, including Spectris Canada, with operational policies and procedures tailored to suit local needs.

Spectris has several Group wide policies in place which address its Modern Slavery compliance requirements and standards. These policies all fully apply, and are thoroughly implemented, by Spectris Canada. Details of these policies are outlined below.

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. Our policies include:

- ❖ **Human Rights** : We believe human rights to be of the utmost importance. Our human rights policy is consistent with the Core Conventions of the International Labour Organization and requires that we comply with internationally recognised human rights standards. It sets out our position on non-discrimination, harassment and forced labour. Spectris Canada aims to comply with internationally recognised human rights standards at all of our sites.
- ❖ **Code of Business Ethics**: Our Code of Business Ethics makes clear to employees the actions and behaviours expected of them when representing the organisation. All leaders, directors, functional heads, managers and supervisors are required to actively promote our Code, and make time for regular discussions with their teams on how to apply it to their business. We expect our suppliers, sub-contractors, temporary workers and other third parties that we work with, to apply the principles of our Code or work to their own similar standard.

Our Code was updated in 2020 and includes specific safeguards against Modern Slavery by setting out the following responsibilities:

- Be vigilant to ensure that all employees and anyone who works with us does so free from slavery and is safe from abuse.
- Support all necessary human rights due diligence for any business partner you are looking to engage.
- If you suspect that anyone's human rights are being abused in connection with our business you must speak up.

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. In 2023, refresher training on the Code of Business Ethics was carried out across the Group.

- ❖ **Third Party Policy & Procedures:** Within our internal Spectris Group Manual, our 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 Modern Slavery. 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 Modern Slavery 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.

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.

- ❖ **Supplier Code of Conduct:** The Spectris Global Supplier Code of Conduct 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.

The Supplier Code outlines the requirements we have of our suppliers, which include a commitment to:

- Uphold and demonstrate high standards of integrity, governance and business practice.
 - Ensure 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.
 - Ensure no unreasonable restrictions on workers' freedom of movement including the requirement to lodge deposits or identity papers.
 - Provide all workers with clear and understandable information regarding their employment and all disciplinary matters must be appropriately recorded.
 - Not employ 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.
 - Verify the age of workers using an appropriate process.
 - Provide working conditions which meet Spectris' high standards on health, safety, hygiene and environmental practices.
 - Pay 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.
- ❖ **Standard form supply contracts:** Wherever possible, Spectris Canada 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.

DUE DILIGENCE AND SUPPLY CHAIN VERIFICATION, AUDITING AND CERTIFICATION

In addition to due diligence processes, the Spectris Group conducts on-site visits to investigate the specific operations of key suppliers. This allows us 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 Group compliance framework.

RISK ASSESSMENT

We consider the risks of Modern Slavery in the direct operations of Spectris Canada to be low. It is a very specialised and technical business. Our employees are all based in Canada, many of whom are highly qualified engineers and technicians. None of our workers is under the age of 18 years.

Likewise, we consider the risks of Modern Slavery within the group of suppliers of goods and services engaged by Spectris Canada to be relatively low. As discussed above, the vast majority of our tier 1 suppliers are located within Canada. However, as Spectris Canada also sells the Malvern Panalytical, Claisse and Red Lion products manufactured by our global Spectris Group, the risks within our global supply chain are relevant to Spectris Canada as well.

Spectris Canada is committed to identifying and preventing all forms of Modern Slavery in our business and to also supporting our supply chain in achieving the same goal. To this end, we have 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 Spectris 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 in the Group's supply chain. Based on this assessment, the Spectris 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 Spectris 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

The Spectris Group recognises that all supply chain management staff within the organisation working in all countries need to complete risk-based Modern Slavery training. The Group does undertake regular refresher training on the Code of Business Ethics, including within Spectris Canada, which includes training on fair employment, human rights and working with partners and suppliers. In 2021, comprehensive and mandatory risk-based training on Modern Slavery was rolled out across the Spectris Group to individuals who have direct contact with the Group's supply chain.

REMEDIAL MEASURES

Spectris Canada has not identified any Modern Slavery in its operations or supply chain. As a result, we have not had to take any measures to remediate any Modern Slavery or to remediate a resulting loss of income for vulnerable families. Spectris Canada is dedicated to upholding our commitments to combat these issues while actively working to mitigate any resulting adverse impacts.

ASSESSMENT OF EFFECTIVENESS

Spectris Canada recognizes that we have a responsibility to assess and mitigate the risk of Modern Slavery in our operations and supply chain over the long term. We are continuing to assess the risks of Modern Slavery in our operations and supply chains and have not yet taken any actions to assess the specific effectiveness of any actions taken in respect to Modern Slavery. As previously mentioned, employees all work according to a strong common framework of controls, management KPIs, financial discipline and rigorous operating principles.

FUTURE STEPS/ ANY OTHER ACTIONS

Following the publication of our Supplier Code of Conduct, during 2024, we will continue to refine and improve our procedures for the identification and prevention of Modern Slavery.

APPROVAL

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the board of directors of Spectris Canada Inc.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest for and on behalf of the Board of Directors of Spectris Canada that I have reviewed the information contained in the report for the entity listed above. Based on the knowledge of the Board, having exercised reasonable diligence, I attest for and on behalf of the Board that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the Reporting Period.



Daniel Raymond
President
Spectris Canada, Inc.



Oscar Almeida
Director
Spectris Canada, Inc.