

# **Anti-Slavery Policy**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the "Act"), with respect to the financial year starting 4th January 2022 and sets out the steps that Wessex Pumps and Pipework Limited ("The Company") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business and supply chains.

Modern slavery encompasses slavery, servitude, forced or compulsory labour, or otherwise exploiting another person in violation of the Act. The company strongly condemns and has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective policies and processes in place to safeguard against any form of modern slavery taking place within our business and supply chain.

This statement outlines the steps we have taken at the company to identify and prevent slavery and human trafficking in our operation and supply chain. We understand our responsibilities under the Act and are committed to improving our practices to combat slavery and human trafficking.

# Our business and supply chains

The principal activity of Wessex Pumps and Pipework Ltd is as a specialist contractor and supplier to the water, mining, and quarrying industries.

The company has a limited supply chain given the nature of our business stream, which are all within the greater sphere of water related abstraction and civil works. The main suppliers to the business are professional services firms (including legal, accounting and audit), recruitment agencies, office space providers, suppliers of financial and related data, general specialist suppliers of industry related consumables, and companies that provide the office supplies (including cleaning and security in its office space), computer and telecommunications hardware and software applications, other office services required to operate an office environment (e.g. stationery, food and drink for employees) and utilities.

For further information about our business please visit our website <u>www.wessexpumps.com</u>

#### Risk assessment

The company recognises its responsibility to identify and address potential and actual modern slavery issues that are linked to our business activities and supply chain. As such, the company has assessed the risk of modern slavery and human trafficking across the supply chain to identify any potential high-risk suppliers by considering relevant factors including geography, sector and products/services provided to the company.

The company also maintains policies and controls in place across our business and supply chain to:

• identify inappropriate employment practices

- identify, assess, and monitor potential risk areas
- mitigate the risk of slavery and human trafficking occurring
- protect whistle-blowers
- investigate reports of Modern Slavery

While the company has not identified any aspects of our business or supply chain that present an elevated risk of modern slavery, we are committed to ensuring that our business and supply chain are free of modern slavery. The company will periodically assess and manage the risk of slavery and human trafficking taking place in our businesses and supply chain. We will not knowingly engage in or support any business that is involved with modern slavery. Therefore, we have adopted policies and processes designed to mitigate any risk that may exist.

Given that the company deals principally with ISO qualified companies and leading business services providers linked to the water services industry, we consider the risk of slavery and human trafficking in our business and supply chains to be low.

## Due diligence on supply chains

The company's policy is not to contract with a supplier or agree to hire a supplier to provide goods or services that the company knows or has reason to believe is subjecting another person to slavery, servitude, forced or compulsory labour, or exploiting another person in violation of the Act.

To identify any modern slavery and human trafficking, or risks of such conduct within our supply chain, the company has undertaken a due diligence process on its current and future suppliers. Pursuant to this process, the company performs a risk-based review of its suppliers, including the use of databases and supplier questionnaires. In addition, the company may request that suppliers subject to the Act provide or describe their own policies related to modern slavery and human trafficking and confirm that they will not engage in modern slavery or other prohibited activities under the Act.

The company's terms and conditions of business with its suppliers include modern slavery and human trafficking provisions confirming our and the supplier's compliance with the Act.

#### Our policies and processes

The company has adopted an internal Policy for Compliance with Modern Slavery Act. Pursuant to the Policy, the company is prohibited from engaging in the practices of slavery, servitude, forced or compulsory labour, or otherwise exploiting another person in violation of the Act.

The Policy furthermore prohibits contracting with a supplier or agreeing to hire a supplier to provide goods or services that the company associate responsible for contracting with or hiring the supplier knows or has reason to believe is subjecting another person to slavery, servitude, forced or compulsory labour, or otherwise exploiting another person in violation of the Act.

We have rigorous HR policies and practices which are in line with our obligations pursuant to the Act; background checking procedures are thorough and apply equally to permanent employees as to contractors.

Accompanying this is the company Whistleblowing Policy which outlines the process for the company employees to escalate concerns and breaches of the company Policy.

## Training

The company has made information about slavery and human trafficking and the Policy available to its staff. The company continues to promote awareness of the Act among employees, and we endeavour to educate and raise awareness of the Act and its requirements within our supply chain.

## Approval of this statement

This statement will be reviewed annually and updated as needed.