Introduction

This Modern Slavery and Human Trafficking Policy Statement relates to actions and activities during the financial year 6 April 2022 and 5 April 2023.

The statement sets down SPP Pumps Limited's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This policy covers all the activities of SPP Pumps Ltd and its subsidiaries. It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with SPP and/or any member of our Group, to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with our anti-slavery policy.

The Company is global and currently has operations in the following countries: UK, France, Benelux, Germany, North and South America, Middle East, Asia, Australia & New Zealand, South Africa, Italy, Poland, Czech Republic, Russia and Egypt.

Responsibility for the Company's anti-slavery initiatives is as follows:

1.1 Policies: The HR Manager is responsible for creating and reviewing policies. The process by which policies are developed is by looking at current best practice, taking legal advice as appropriate and adapting to the needs of the Company.

1.2 Due diligence: our Business Unit Managers and Supply Chain Manager are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all Procurement, Human Resources and Commercial staff to familiarize themselves with our policies and complete appropriate Company E Learning modules.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

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P-000-01 – Policy Template

The following policies and terms of business set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

2.1 **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.

2.2 **Dignity at Work and Equal Opportunities Policies** – These policies set down the actions and behaviours expected of employees when representing and working within the company.

2.3 **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

2.4 **Terms & Conditions of Purchase.** Our Terms and Conditions of Purchase contain our Code of Conduct which defines the basic requirements placed on SPP Pumps Vendors concerning their responsibilities towards their stakeholders and the environment

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Senior Management Team endorses this policy statement and is fully committed to its implementation.
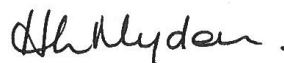
This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Helen Myden

Position: Human Resources Manager

Date: 6 April 2022

Signature:

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