



# Anti-Slavery and Human Trafficking Policy

## Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance for slavery and human trafficking in any part of our business, including our supply chains. We have a number of policies in place to ensure all our employees have the right to work and are paid fairly, that we act with integrity and ethically, and that we have effective measures in place to ensure modern slavery is not present anywhere in our own business or in any of our supply chains.

This includes our Equal Opportunities policy, which encompasses recruitment, promotion, training, performance management and reward. Our principles of fair treatment and respect are also applied to our relationships with customers, suppliers, contractors, shareholders and other stakeholders.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods, these as well as the suppliers of services make up the supply chain within Oliver Ashworth Limited. We expect the same high standards from all our suppliers, contractors and other business partners.

Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

As part of the company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. We include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, contractors and business partners.

## Compliance with the policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

### **Communication and awareness of this policy**

This Policy considers, and supports the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO9001:2015 and ISO 14001:2015

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Responsibility for the policy**

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to your manager.

### **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

We are committed to combatting slavery and human trafficking. We supply pipes, fittings and valves to the Commercial Mechanical Services and Industry Markets.

### **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have in place systems to:

Identify and assess potential risk areas in our supply chains.

Mitigate the risk of slavery and human trafficking occurring in our supply chains.

Monitor potential risk areas in our supply chains.