

Policy Statement Modern Slavery

MODERN SLAVERY POLIICY STATEMENT



It is the policy of Prime Pumps (PP) not to utilise the services of suppliers and sub-contractors who have links to modern slavery, child labour and human trafficking.

PP conduct engineering and maintenance activities across the utility, industrial, oil, gas and general engineering sectors. The potential for modern slavery within the supply chain has been assessed as low risk from our first tier, client framework suppliers and sub-contractors having links to modern slavery, child labour or human trafficking.

Due to the nature of work conducted and items supplied by PP, the risk of engaging the services of a supplier or sub-contractor with links to Modern Slavery is considered as low.

The majority of suppliers and sub-contractors utilised, are located within the UK or European Economic Area, (EEA), and are also Framework Suppliers for our Clients. However, PP will use due diligence when engaging all new and existing suppliers or sub-contractors regardless of geography, framework or services provided. PP Employees have received training in identifying those at risk of modern slavery, child labour or human trafficking and how to report suspicions.

To ensure compliance with the Modern Slavery Act 2015, PP have and will continue to:

- Use due diligence when utilising the services of suppliers and sub-contractors who operate in locations or areas considered high risk e.g. car washes, where modern slavery, human trafficking or child labour is more prevalent.
- Ensure all new suppliers or sub-contractors complete a supplier and sub-contractor pre-qualification questionnaire which includes a declaration that they do not engage in, or utilise the services of suppliers and sub-contractors who have links to modern slavery, human trafficking or child labour.
- Review existing suppliers and sub-contractors and request an annual declaration of compliance with the Modern Slavery Act 2015. This is usually requested at same time as requesting updated insurance information.
- Ensure purchasing practices do not put undue pressure on our supply chain, increasing the risk of MS.
- Introduced a clause in supplier and sub-contractor terms and conditions relating to action taken in the event of non-compliance with the Modern Slavery Act.
- Conduct audits on suppliers or sub-contractors where it is suspected that modern slavery, human trafficking or child labour may be used.
- Communicate this policy to all employees and make this policy readily available on the company's website.
- Provide employees with training to increase their awareness of modern slavery, child labour and human trafficking and to ensure regular refresher training is conducted.
- Conduct due diligence regarding new employees, ensuring that when setting up payroll the new employee bank account holders name matches the employee details.

Where suppliers or sub-contractors are found to have links to modern slavery, human trafficking or child labour then PP will terminate the services of that supplier or sub-contractor and report it to the authorities.

The following KPIs have been set with regards to Modern Slavery:

- 100% of all personnel in management and procurement positions trained in MS awareness.
- Modern Slavery Risk Assessments will be conducted on High Risk Suppliers or Sub-contractors.

Anyone who suspects there may be Modern Slavery, Child Labour or Human Trafficking are to report their suspicions to their Line Manager or to the HR department. Or by calling the police on 999 if there is an immediate risk of harm, or by reporting to the police on 101 or the Modern Slavery Helpline on 08000 121 700 if there is no risk of immediate harm.

The Board of Directors will review and approve this policy at the end of each financial year and revise or update it as necessary.

Ian Hart: 

Managing Director
Prime Pumps Ltd