SUBJECT:

MODERN SLAVERY AND HUMAN TRAFFICKING

Introduction

The UK Modern Slavery Act 2015 stipulates that businesses are required to publish a statement each financial year demonstrating an understanding of the Act and the steps that are being taken to ensure that modern slavery and human trafficking are not taking place, whether within the business or its supply chains, in any way.

Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world. They are a violation of fundamental human rights and as such Primaflow Ltd will not tolerate or condone slavery or human trafficking in any part of our organisation. We have a zero-tolerance approach to modern slavery and human trafficking and are totally committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, employees, and all other business partners to commit to the same.

The company will not knowingly support or deal with any business involved in slavery or human trafficking.

There were no reported incidents of modern slavery or trafficking in the 2022 financial year.

Primaflow Ltd have published this statement relating to the financial year ending 31st December 2022.

Our business

Primaflow Ltd is a leading national distributor serving the plumbing merchant trade with a mission to simply deliver more. With over 340 professional, dedicated and well trained employees serving more than 3500 customers from our network of 9 distribution centres, Primaflow Ltd consistently strive to deliver reliability, friendliness and delivering more with simplicity.

All company sites are based in the United Kingdom. The majority of our sales are within the UK; however we also have a customer base in the Republic of Ireland, and the Falklands Islands. Primaflow Ltd also works with a number of international suppliers from a number of countries, including:

- Turkey
- France
- China
- Germany

The majority of our suppliers operate within the European Union; however, we are conscious of the increased risk posed by the trade undertaken outside of this area and are working on building stricter controls to reduce our risk of exposure to unethical practices and procedures.

The majority of Primaflow Ltd.'s workforce is employed permanently, using agency workers as required.

In our 2022 statement one of our goals was to formally publish our new Supplier Due Diligence Questionnaire across the Company after a successful period of testing. This has now been issued and will be used for all suppliers ongoing, as well as being rolled out across existing suppliers over an agreed period. This will ensure uniformity in the way Due Diligence is completed with all our suppliers and provide a comprehensive overview of their operations, assisting in identifying any areas of concern or increased risk.

CONFIDENTIAL AND FOR INTERNAL USE ONLY © PRIMAFLOW LTD

The Directors and senior management team at the Company have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us, or on our behalf, comply with it.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us, or on our behalf, in any capacity.

Policies

All our policies, including Modern Slavery, are available on our online document storage facility, referred to as our Portal and this is made available to all employees electronically. An introduction to this Portal forms part of our Induction process for all new employees. Our key policies are also displayed on the notice board at all locations. These policies are reviewed annually. We also publish our Modern Slavery statement on the government registry.

Code of Conduct: All new starters to the business are provided with our Code of Conduct on employment as part of the Company Handbook and specifically in our Standard Practice Instruction, Business Ethics. A declaration of compliance to the behaviours expected is required and refreshed.

Adult and Child Safeguarding Policy: Communicates the safeguarding of vulnerable adults and children.

Equal Opportunities Policy: Within our own business we ensure that all employment laws and Right to Work checks are adhered to through policies, incorporating high standards of conduct communicated in our Employee Handbook. We have a confidential reporting line for whistleblowing, accessible to all employees and notices with information regarding this reporting line are clearly displayed at all locations.

All persons working for us in any capacity must read, understand, and comply with our Modern Slavery policy and avoid any activity which may lead to, or suggest, a breach of this policy.

Training

Modern Slavery training is now embedded in our structure and all employees are expected to complete our online course on induction and annually thereafter. The training module focuses on understanding, identifying, and reporting suspected modern slavery.
The completion of this training is monitored centrally, and we have since improved our reporting of each employee's training status.

Due Diligence

Primaflow Ltd is satisfied from its own due diligence there is no evidence of any act of modern slavery or human trafficking within its own organisation.

While many of our suppliers operate within the European Union, we are conscious of the increased risk posed by the trade undertaken outside of this area and work with a centralised Chinese agent who supports all Far East supplies. The majority of larger factories have, or are updating, BSCI / SMETA / SA8000 audits. For smaller factories a self-declaration is made, which are subject to random checks on critical points.

CONFIDENTIAL AND FOR INTERNAL USE ONLY © PRIMAFLOW LTD

As part of Primaflow Ltd.'s due diligence processes into modern slavery and human trafficking the supplier approval procedure incorporates a review of the controls undertaken by them. The Company also conducts premises visits, as deemed necessary, to overseas suppliers to ensure due diligence is observed.

This process will be made more robust with the use of our Questionnaire alongside existing controls.

Risk Assessment

Our business is based in the United Kingdom and as such has a low risk of exposure to modern slavery or trafficking. However, we do acknowledge that some areas in our supply chain are at an increased risk of modern slavery occurring (based on information taken from Global Slavery Index).

Our Modern Slavery training includes important information regarding red flags and how to report concerns and we hope that this will encourage any individual with genuine concerns to raise them immediately and with confidence.

Monitoring Working Conditions

Through a process of regular audits, conducted by our internal audit team, we monitor the working conditions of our employees within our own organisation. The findings of these audits are then fed back to the operational directors and shareholders.

Our new Supplier Due Diligence Questionnaire requires our suppliers to provide information surrounding working conditions enabling us to better assess the overall conditions within our supply chain. Working conditions are also assessed during supplier and customer visits conducted by our commercial team.

Looking forward

We continue to work on the following in the 2023 financial year:

Supplier Due Diligence Questionnaire – Implementation of the Questionnaire for all new suppliers with immediate effect. All existing suppliers will be required to have completed the Questionnaire by December 2025, with a target of 50% completed by December 2024. Solicit feedback on the content and scope of the questionnaire to ensure it is as effective and comprehensive as possible ongoing.

Risk Assessment – We will work on developing our overriding risk assessment for engaging with a new supplier and improving the recording of our findings and assessment, with the aim to incorporate the new Questionnaire responses.

Primaflow Ltd will review both its supply chain and internal operations on an annual basis to check compliance with the above policy, and to ensure that our policy is being implemented effectively.

The Directors and senior management team will review the Company's statement in response to any major business, organisational or legislative changes or as a result of any breach or concern regarding modern slavery and approved this current statement.

CONFIDENTIAL AND FOR INTERNAL USE ONLY © PRIMAFLOW LTD

SUBJECT:

MODERN SLAVERY AND HUMAN TRAFFICKING



CONFIDENTIAL AND FOR INTERNAL USE ONLY © PRIMAFLOW LTD