



Personnel Procedures Manual

Modern Slavery Act 2015 – Anti Slavery Policy Statement

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1. Introduction and Policy Statement

- 1.1. The Modern Slavery Act 2015 (the 'Act') mandates that J. R. Pridham Services Limited ('JRP') prepares a slavery and human trafficking statement each financial year.
- 1.2. Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world and a violation of fundamental human rights.
- 1.3. JRP have a zero-tolerance approach to modern slavery and human trafficking and are 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, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

2. Our Business

- 2.1. The economic, social and environmental footprint of our business activity is a fundamental consideration in JRP's commitment to responsible and sustainable business growth.
- 2.2. JR Pridham Services Ltd (JRP) have been providing specialist MEICA related services since 1987 and together with expert knowledge and widespread industry experience coupled with an excellent Health & Safety record, we continue to provide cost effective quality solutions and services across the following core disciplines.
 - Mechanical & Electrical Engineering
 - Systems & Telemetry Integration
 - Instrumentation & Control
 - 'WaSP' family of processes optimisation solutions (Tankered Waste Reception, Wastewater Sludge Management & Control, Auto Decanting, Cake Loading, etc)
 - Valve and Actuator solutions / accessories & services
 - Fabrication and additional support work, to include minor civils, etc.
- 2.3. Whether working as a part of a team in an alliance partnership, within a Framework Agreement or directly engaged by the end user, our clients can be assured that the greatest care and attention to detail will ensure costs are kept to a minimum, workmanship and quality standards are upheld and delivery to agreed timescales is achieved.



Personnel Procedures Manual

Modern Slavery Act 2015 – Anti Slavery Policy Statement

3. Responsibility for The Policy

- 3.1. The Directors and senior management team of JRP 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 in any capacity comply with it.
- 3.2. 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 (including our employees, suppliers, workers, directors, agents, distributors and all third party business partners) .
- 3.3. Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

4. Commitment

JRP are implementing and enforcing measures, policies and controls both internally and externally to ensure compliance with the requirements of the Modern Slavery Act 2015:

- 4.1. Training on this policy and the risk our business faces from Modern Slavery and Human Trafficking forms part of the induction process for all individuals joining the business and an e-learning module is being created for all existing staff employed in a purchasing function. Regular refresher training will be provided as required.
- 4.2. The issues surrounding Modern Slavery and Human Trafficking have been added to the JRP Handbook which is available to all employees.
- 4.3. The JRP Terms and Conditions of Purchase have been amended to encompass Modern Slavery and Human Trafficking and copies are available to our suppliers on request.

5. Compliance

- 5.1. All persons working for us or on our behalf in any capacity must:
 - 5.1.1. read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy.
 - 5.1.2. Notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future; and
 - 5.1.3. 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.

6. Whistleblowing

- 6.1. Whistleblowing Procedure (Procedure PP.04/01), direct access to senior leadership; JRP have a whistleblowing procedure (Procedure PP.04/01) which is intended to provide guidance on how concerns can be communicated about suspected modern slavery associated with the Company or our suppliers.

- 6.2. The nature of the matter reported will determine the Company's next course of action.



Personnel Procedures Manual

Modern Slavery Act 2015 – Anti Slavery Policy Statement

6.3. The Company encourages members of the public or people not employed by us to write to our head office to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

7. Safeguards

7.1. We aim to encourage openness and to support anyone who raises genuine concerns in good faith, even if mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting their suspicion that modern slavery may be taking place in any part of our own business or in any of our supply chains. The company will accept and take seriously concerns communicated anonymously.

7.2. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

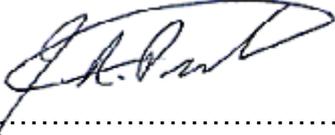
8. Breaches of Policy

8.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

8.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

9. Ongoing Review

9.1. JRP will review both its supply chains and external operations and its internal operations on an ongoing basis to check compliance with the above policy, and to check that our policy is being implemented effectively.

Signed:  Date: July 2022
Mr Jim Pridham - Managing Director

Review Date: July 2023