MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

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Registration No. 1564477

MODERN SLAVERY AND HUMAN TRAFFICKING
POLICY STATEMENT

DOCUMENT INFORMATION

CLASSIFICATION	Unclassified Public	**VERSION NUMBER**	10	**STATUS**	Live
VALID FROM	30th June 2025	**APPROVED BY**	Louise Clayton	**PREPARED BY**	Gary MacAlister

VERSION HISTORY

DATE	VERSION NUMBER	NAME	CHANGE DESCRIPTION
November 2016	1	Sean Noonan	New policy
July 2017	2	Andy White	New director sign off Annual review
July 2018	3	Andy White	Annual review
July 2019	4	Andy White	Annual Review
July 2020	5	Andy White	Annual Review
July 2021	6	Andy White	Annual Review
July 2022	7	Andy White	Annual Review
June 2023	8	Sean Noonan	New director sign off New branding
December 2023	8.2	Louise Clayton	Handover to new signature
December 2024	9	Louise Clayton	Annual Review Expanded definitions Addition of the word "modern" throughout document
June 2025	10	Louise Clayton	Annual renewal to tie in with the end of our financial year (30th June). Roll change for Louise C

*This policy will be updated annually, or sooner if any changes are required

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POLICY STATEMENT

SCOPE

This statement sets out the steps that Steve Vick International (SVI) has taken to make sure that modern slavery and human trafficking is not taking place in our supply chain or in any part of our business.

SVI is a UK based medium sized company that works closely with utilities companies to provide products and solutions to the repair, replacement and decommissioning of pipework. Our work mainly covers the UK, but also has pockets of work across the rest of the world including Europe & the Middle East.

Definitions

SVI considers that modern slavery encompasses:

- human trafficking;
- forced work, through mental or physical threat;
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse;
- being dehumanised, treated as a commodity or being bought or sold as property;
- being physically constrained or to have restriction placed on freedom of movement.

PRINCIPLES AND STANDARDS

SVI acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015.

As a statement of principle SVI has a zero tolerance approach to any form of modern slavery, forced labour, child labour or human trafficking in relation to our business and in our supply chain. We will endeavour to ensure slavery and human trafficking are eliminated however, we cannot guarantee that it is not present in some form if our supply chain partners do not honestly disclose information to us when requested.
We therefore expect all businesses in our supply chain to adhere to this principle in relation to their own businesses to protect workers throughout our supply chain against any such abuse.

This also means that we expect suppliers to operate effective means of disclosure within their own organisations and to honestly disclose any statements to SVI when conducting supplier audits.

The standards which we expect businesses in our supply chain to maintain include:

- No forced, bonded, or other involuntary labour, slavery or human trafficking.
- No child labour, which means any person under the age of 15 or (if higher) the mandatory school leaving age under local laws.
- Not to discriminate against workers or prospective recruits on any basis (including without limitation) in relation to race, colour, religion, sexual orientation, pregnancy, age, disability, political opinions, or other personal characteristics.
- Ensure that all workers are treated with respect and human dignity and prohibit all forms of violence, physical abuse, harassment or intimidation.
- Comply with local laws on working hours and time periods.
- Workers' pay must comply with applicable local laws, including in relation to minimum wage requirements.
- Providing equal opportunities and diversity in the workplace.

HUMAN RESOURCES

All new starters are subject to prescribed right to work checks so as to ensure that SVI does not employ illegal workers. SVI operates an employee code of conduct which requires employees to uphold SVI's high standards of business integrity, honesty and transparency in all aspects of its business dealings.

MODERN SLAVERY AND HUMAN TRAFFICKING
POLICY STATEMENT

Employees are given awareness training of the issues surrounding slavery and human trafficking. All staff are required to uphold SVI's high standards of business integrity, honesty and transparency in all its business dealings. Employees are required to immediately report any possible breach of the code of conduct to their line manager, or directors.

This statement is made to comply with section 54(1) of the Modern Slavery Act 2015 and constitutes the SVI slavery and trafficking statement for the financial year ending 30th June 2026. SVI will provide a copy of this policy statement within 30 days of receiving the initial request.

APPROVAL

L. Clayton

Louise Clayton
Director of HR