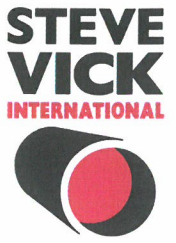


MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



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DOCUMENT INFORMATION

CLASSIFICATION	Unclassified Public	VERSION NUMBER	11	STATUS	Live
VALID FROM	29 th July 2026	APPROVED BY	Louise Clayton	PREPARED BY	Gary MacAlister

VERSION HISTORY (LAST 5 UPDATES)

DATE	VERSION NUMBER	NAME	CHANGE DESCRIPTION
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 (30 th June). Roll change for Louise C.
July 2026	11	Louise Clayton	Annual renewal and update to tie in with the end of our financial year (30 th June). Change from “Policy” to “Statement”.

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



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



ORGANISATION

This statement applies to Steve Vick International (referred to in this statement as “SVI” or “the Organisation”).

This statement sets out the steps SVI has taken, and continues to take, to understand, prevent and mitigate the risk of modern slavery and human trafficking in our operations and supply chains.

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015 (Transparency in Supply Chains) and covers the financial year ending **30th June 2027**.

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 or the threat of abuse;
- being dehumanised, treated as a commodity or being bought or sold as property;
- being physically constrained or having restriction placed on freedom of movement.

ORGANISATIONAL STRUCTURE

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.

Demand for our products and services is consistently high throughout the year and is therefore not seasonal.

SVI is controlled by a board of directors.

OUR SUPPLY CHAIN

We procure goods and services from an approved range of UK and overseas suppliers. All suppliers must complete an assessment prior to approval, and this requires authorisation from Procurement, QSHE & Finance departments. Key suppliers also undertake regular reviews of their systems to reassess their compliance with modern slavery and human trafficking processes.

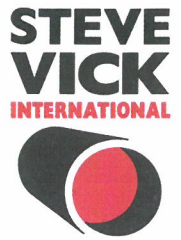
There is a risk of modern slavery occurring within our supply chain, but we strive to minimise and mitigate this risk by using a number of local and reputable suppliers.

We are committed to ensuring there is no modern slavery or human trafficking in our supply chains, and we expect all businesses in our supply chain to operate to the same standard, to protect workers throughout our supply chain against any such abuse.

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.



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



GOVERNANCE AND ACCOUNTABILITY

SVI acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. SVI understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the UK or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to SVI in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

Our due diligence is proportionate to our size, activities and risk profile and includes:

- including appropriate modern slavery and ethical employment clauses in contracts, terms and conditions;
- maintaining recruitment controls to help ensure workers are legally entitled to work in the UK and are treated fairly;
- providing routes for staff to raise concerns;
- challenging abnormally low-cost tenders where appropriate to help ensure pricing does not rely on unethical labour practices.

Overall accountability for tackling modern slavery sits with senior leadership. The HR department leads on relevant people policies and staff safeguarding.

This statement is approved by the HR Director and reviewed at least annually. We keep our controls under review to ensure they remain proportionate to our risk profile and aligned with relevant government guidance and good practice.

RISK ASSESSMENT AND MANAGEMENT

We assess modern slavery risk when we procure goods and services, manage contracts and recruit staff. Our approach prioritises higher-risk areas (for example, labour-intensive services) and considers factors such as the nature of the service, use of subcontractors, and where goods or services may be sourced from outside the UK. This includes:

- requiring suppliers to comply with applicable laws and our contractual expectations on ethical employment;
- seeking assurance (where proportionate) on how suppliers prevent modern slavery in their own operations and supply chains;
- using contract management to identify issues early (for example, through performance reviews and escalation routes);
- acting on concerns, including working with suppliers to investigate, requiring corrective action where needed and considering termination for serious breaches.



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



ORGANISATIONAL POLICIES

The following SVI policies, available to all staff, further define our stance on modern slavery:

- Modern Slavery;
- Equality, Diversity and Inclusion;
- Recruitment and Selection Policy and Procedure;
- Anti-bullying and Anti-harassment;
- Whistleblowing.

MEASURING EFFECTIVENESS

We will keep our approach under review and, where proportionate, use indicators to understand effectiveness, such as completion of relevant training; evidence of modern slavery considerations in procurement activity; and the number and nature of concerns raised and addressed through our reporting routes.

If a member of staff suspects modern slavery or human trafficking connected with our operations or supply chains, they are encouraged to report it promptly through line management or the HR department. We will take concerns seriously, investigate appropriately, and work with relevant partners or authorities where required.

APPROVAL

This statement has been approved by Louise Clayton, SVI's HR Director, for the financial year ending **30th June 2027**.

This statement will be reviewed and updated every year.

A handwritten signature in black ink, appearing to read 'L. Clayton'.

Louise Clayton
HR Director

