

Effective: September 2024

Anti-slavery Policy

Policy Overview

The purpose of this policy is to outline the responsibilities of Roto Pumps UK and its employees in preventing modern slavery and human rights violations in our operations and supply chains. It provides guidance on recognizing and addressing modern slavery and related human rights issues in compliance with the Modern Slavery Act 2015 (the "Act").

Applicability

This policy applies to all Roto Pumps UK employees, contractors, suppliers, and business partners. It is overseen by the Company Secretary and applies equally across the organization without discrimination.

Corporate Governance

- **Commitment to Human Rights**

Roto Pumps UK is committed to conducting all business operations ethically and in accordance with international human rights standards. Our operations are guided by the Universal Declaration of Human Rights, the International Labour Organisation's (ILO) core labour standards, and relevant local laws. We maintain open, respectful communication with stakeholders regarding human rights concerns.

- **Stance on Modern Slavery**

Modern slavery, which encompasses slavery, servitude, forced labour, and human trafficking, constitutes a severe breach of fundamental human rights and is a criminal act. Roto Pumps UK has a strict zero-tolerance policy towards modern slavery. We are committed to ethical business practices and ensure strict compliance with the Modern Slavery Act 2015. This includes proactive measures to prevent modern slavery within our operations and supply chains.

- Suppliers and business partners are expected to uphold the same high standards in line with our Code of Conduct, which prohibits forced labour, child labour, and trafficking in persons. Suppliers must ensure these standards are enforced within their operations and supply chains.

Core Focus Areas

- **Equality and Diversity:** Roto Pumps UK fosters a safe and inclusive work environment where all employees are treated fairly and respectfully. We comply with equality and diversity laws and require our suppliers to follow similar principles.
- **Freedom of Association and Collective Bargaining:** Roto Pumps UK respects employees' rights to join trade unions and engage in collective bargaining. Our suppliers are also expected to respect these rights.
- **Child Labour Prohibition:** Roto Pumps UK complies with UK laws and does not tolerate child labour. Suppliers must ensure children are not involved in any operations or supply chains.
- **Fair Working Conditions:** We provide fair wages, reasonable working hours, and comprehensive benefits. Our suppliers are expected to meet the same standards.
- **Health and Safety Standards:** Roto Pumps UK prioritizes a safe work environment and continuously improves health and safety measures. Suppliers must comply with all relevant health and safety laws and our internal standards.
- **Support for Vulnerable Customers:** We ensure fairness and integrity in our dealings with vulnerable customers by implementing processes tailored to support their needs.
- **Environmental Responsibility:** We are committed to minimizing our environmental impact and achieving Net Zero Carbon by 2035. We expect suppliers to adopt environmentally sustainable practices as well.

Roles and Responsibilities

All employees and individuals working on behalf of Roto Pumps UK must understand and adhere to this policy. Preventing, identifying, and addressing modern slavery is the responsibility of everyone within the company. Management must ensure that their teams are regularly trained on this policy and the risks of modern slavery.

Reporting and Whistleblowing

Any concerns or suspicions regarding modern slavery must be reported to the Legal Compliance team via davebent@rotopumps.co.uk. Concerns may also be reported to the Company Secretary. We are committed to protecting those who report issues in good faith and ensuring their concerns are handled confidentially and responsibly.

Risk Mitigation

- **Risk Assessment**
Roto Pumps UK conducts annual risk assessments to identify potential modern slavery risks in our operations and supply chains. Business units must continuously assess their vulnerability to such risks, with support from Group Risk and Legal Compliance.
- **Monitoring and Controls**
Each business unit must maintain an effective system for monitoring transactions and risks related to modern slavery. Business unit managers are responsible for taking the necessary steps to protect human rights and prevent modern slavery in their operations.
- **Employee Training and Supplier Communication**
All employees receive training on this policy as part of their onboarding process. Additional training is provided as needed. Our zero-tolerance stance on modern slavery is communicated to all suppliers and business partners at the start of business relationships and as necessary throughout the partnership.
- **Due Diligence for Business Partners**
Roto Pumps UK requires all business partners to adhere to our Code of Conduct for Supply Chain Partners. Risk assessments are conducted during the onboarding process, and business partners must comply with high standards regarding human rights and modern slavery prevention.

Policy Enforcement

Consequences for Non-Compliance

Employees found to be in violation of this policy may face disciplinary action, including termination. We reserve the right to terminate relationships with suppliers, contractors, or business partners who breach this policy.

Version Control

Version 1.0: Initial policy draft for Roto Pumps UK adoption of Anti-Modern Slavery and Human Rights Policy.