



Anti-Slavery & Human Trafficking Statement

Rev: 05

Date: 15/04/2024

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Special Piping Materials Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Special Piping Materials Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

We undertook an initial process review in 2018 to ensure we were compliant with the UK's Modern Slavery Act which came into force in October 2015. We continue to undertake annual reviews to ensure we have appropriate procedures in place and are satisfied that we do. We believe that our exposure to modern slavery risks has not increased because of Covid, and furthermore note that no breaches of the Modern Slavery Act 2015 were reported during the financial year ended 31 Dec 2023.

OUR BUSINESS

Special Piping Materials (SPM) is the leading global stockholder and supplier of pipes, fittings, and flanges. The company supplies an extensive range of piping products in a variety of high-grade materials including Duplex, Super Duplex, 6% Moly, Nickel Alloys and other difficult to source grades of materials. Our products are used across numerous industries worldwide, including Oil & Gas, Petrochemical, Nuclear, FPSO, LNG and Water Treatment. Founded in 1989, Special Piping Materials has established itself as a market leader. Growing from a single office in Manchester, UK, to a global network of seven sales offices and warehouses across five continents.

OUR POLICIES

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Anti-slavery policy:** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help. **Equality & Diversity policy:** We operate a robust policy as the organisation is committed to providing equal opportunities throughout employment including in the recruitment, training, and development of employees, and to pro-actively tackle and eliminate discrimination.
- **Whistleblowing policy:** The policy is to ensure all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- **Anti-Bribery Policy:** It is our policy to conduct business in an honest way and maintain those high standards to prevent the use of corrupt practices or acts of bribery to obtain an unfair advantage,
- **Code of business conduct.** This code explains the way in which we behave as an organisation and how we expect our employees and suppliers to act.



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OUR SUPPLIERS

Special Piping Materials Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence with all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that the organisation has never been convicted of offenses relating to modern slavery and on-site audits which include a review of working conditions. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business.
- They hold their own suppliers to account over modern slavery.
- (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
- (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operation.

We expect our suppliers to have suitable anti-slavery and human trafficking policies in place within their own businesses and to cascade those policies to their own suppliers.

We may terminate the contract at any time should any instances of modern slavery come to light.

TRAINING

Our policy and processes for the prevention of slavery and human trafficking will be communicated to all employees including forming part of the induction programme for new employees and contractors to ensure a high level of understanding of the risks of modern slavery and human trafficking and will further form part of the company's training.

We regularly conduct training for our procurement/sales teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. We also encourage staff to identify and report any potential breaches of our organisation's anti-slavery policy statement, and whistleblowers are protected through our confidential reporting process.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Signed:

Alex Forth MD

QHSE Manager

Managing Director / General Manager

Approval: MD