

## **Introduction**

The UK Modern Slavery Act 2015 stipulates that businesses are required to publish a statement each financial year demonstrating an understanding of the Act and the steps that are being taken to ensure that modern slavery and human trafficking are not taking place, whether within the business or its supply chains, in any way.

Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world. They are a violation of fundamental human rights and as such Primaflow Ltd will not tolerate or condone slavery or human trafficking in any part of our organisation. We have a zero-tolerance approach to modern slavery and human trafficking and are totally 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.

The company will not knowingly support or deal with any business involved in slavery or human trafficking.

Primaflow Ltd have published this statement relating to the financial year ending 31<sup>st</sup> December 2020.

## **Our business**

Primaflow Ltd is a leading national distributor serving the plumbing merchant trade with a mission to simply deliver more. With over 370 professional, dedicated and well trained employees serving more than 3000 customers from our network of 9 distribution centres, Primaflow Ltd consistently strive to deliver reliability, friendliness and delivering more with simplicity.

All company sites are based in the United Kingdom. The majority of our sales are within the UK, however we also have a customer base in the Republic of Ireland, the Channel Islands, the Falklands Islands and Gibraltar. Primaflow Ltd works with a number of international suppliers from a number of countries, including:

- China
- France
- Germany
- Italy
- Lithuania
- Spain
- Turkey

The majority of Primaflow Ltd.'s workforce is employed permanently, using agency workers as required.

Since our last published statement, we have worked hard to improve our knowledge of the Modern Slavery legislation and the framework surrounding it. It is important to us as a company that our staff and suppliers have a comprehensive set of policies and processes to follow and a clear understanding of what is expected of them with regards to their role in identifying potential acts of slavery or trafficking.

The Directors and senior management team at the Company 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, comply with it.

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.

## **Due Diligence**

The Company is satisfied from its own due diligence there is no evidence of any act of modern slavery or human trafficking within its own organisation.

While many of our suppliers operate within the European Union, we are conscious of the increased risk posed by the trade undertaken outside of this area and work with a centralised Chinese agent who supports all Far East supplies. The majority of larger factories have, or are updating, BSCI / SMETA / SA8000 audits. For smaller factories a self-declaration is made, which are subject to random checks on critical points.

As part of the Company's due diligence processes into modern slavery and human trafficking the supplier approval procedure incorporates a review of the controls undertaken by them. The Company also conducts premises visits, as deemed necessary, to overseas suppliers to ensure due diligence is observed.

Our Modern Slavery Statement is available to all employees and they are expected to read and understand it. This statement must be clearly and prominently displayed on the Notice Board at all business locations.

We are committed to improving our current processes and policies and as such are working on a more robust and comprehensive due diligence policy which can be rolled out across the business to standardise our approach.

### **Risk Assessment**

Our business is based in the United Kingdom and as such has a low risk of exposure to modern slavery or trafficking. However, we do acknowledge that some areas in our supply chain are at an increased risk of modern slavery occurring (based on information taken from Global Slavery Index).

We have recently added Modern Slavery training to our online course library as a step towards improving knowledge and controls. This training includes important information regarding red flags and how to report concerns and we hope that this will encourage any individual with genuine concerns to raise them immediately and with confidence.

There were no reported incidents of modern slavery or trafficking in the 2020 financial year.

### **Looking forward**

We aim to work on the following in the 2021 financial year:

Due diligence – A new policy and due diligence framework to be rolled out across the business to enhance the checks already being carried out in a more structured and uniform manner.

Training – Rolling out our online training options to all employees via our online training suite.

Policies – We are currently working on updating a range of policies to ensure consistency in working practice and standards across the Company.

Access to Policies – We are currently developing centralised online access for viewing policies which will make them more accessible to all employees, at all times, across our company.

Primaflow Ltd will review both its supply chain and internal operations on an annual basis to check compliance with the above policy, and to ensure that our policy is being implemented effectively.

The Directors and senior management team will review the Company's statement in response to any major business, organisational or legislative changes or as a result of any breach or concern regarding modern slavery and approved this current statement.

Approved by

Steve Westbrook  
Chief Executive

Effective 28.06.21