



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction

In line with the Equality Act 2010 and the Modern Slavery Act 2015, this statement sets out the Organisations actions to understand all potential Modern Slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no Modern Slavery or Human Trafficking in their business and supply chains. The Organisation recognises that it has a responsibility to take a robust approach to Modern Slavery and Human Trafficking.

The Organisation is absolutely committed to preventing Modern Slavery and Human Trafficking in its corporate activities, and to ensuring that its supply chains are free from Modern Slavery and Human Trafficking.

### Organisational Structure and Supply Chains

This statement covers the activities of the Organisation currently operating solely in the United Kingdom. Part of the Organisations supply chain operates from within current EU countries.

The following is the process by which the Organisation assesses whether activities or countries are high, medium or low risk in relation to Modern Slavery or Human Trafficking.

The Board of Directors of the Organisation will review and assess the national circumstances of the countries in which it has any form of commercial relationship from available public and governmental information and identify if any "risks" of Modern Slavery or Human Trafficking are apparent or likely, under the circumstances. Any identified risks will be documented, along with any appropriate actions or activities which should be implemented.

### Responsibility

Responsibility for the Organisation's anti-slavery initiatives rests with the Board of Directors of the Organisation. These responsibilities will cover Policies and Procedures, Risk Assessments, Investigations and Due Diligence, Staff Awareness and/or Training.

### Relevant Policies

The Organisation operates the following policies that describe its approach to the identification of Modern Slavery risks and steps to be taken to prevent Modern Slavery and Human Trafficking in its operations:

**Whistleblowing:** The Organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Organisation. Employees are required to report any concerns to a Director of the Organisation, in the first instance.

**Employee Conduct:** The Organisation makes it clear to employees the actions and behaviour expected of them when representing their Organisation. The Organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.

The Organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics in relation to Modern Slavery and Human Trafficking. Suppliers are required to demonstrate their commitment to the avoidance and elimination of Modern Slavery and Human Trafficking through completion of the Organisation's Supplier Self-Assessment Questionnaire and their supporting documentation. The Organisation reserves the right to not enter a commercial relationship or terminate an existing one where it feels there are substantiated concerns.

**Recruitment:** The Organisation uses only specified, reputable employment agencies and its own internal selection and recruitment practices to ensure any prospective or new employee has the right to work in the United Kingdom.

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The collective term 'the organisation' is used to represent the companies indicated in the header &/or footer of this document.

A list of referenced and related documents is available electronically via the Q-Pulse software system's properties page for this document.

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Employment Policies & Procedures Manual  
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### **Due Diligence**

The Organisation undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers, at least annually. The Organisation's due diligence and reviews include the Self-Assessment Questionnaire and any relevant information provided by the Organisation's employees.

### **Staff Awareness and Responsibilities**

The Organisation requires all staff working in any capacity whatsoever to receive, read and understand the document "Modern Slavery Staff Briefing", document reference TBT – 4 – Modern Slavery & Human Trafficking Staff Briefing.

Each Company's Modern Slavery briefing covers:

- The Organisation's stance on Modern Slavery and Human Trafficking and the legal position generally
- how to identify the signs of Modern Slavery and Human Trafficking
- what initial steps should be taken to report concerns if Modern Slavery or Human Trafficking is suspected
- what external help is available, for example through the Modern Slavery Helpline and the Home Office

**This Statement has been approved by the Organisation's Board of Directors, who will review it annually and update if required.**

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Viking Pumps Limited

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