

Integrated Management System

P-043 – Modern Slavery & Human Trafficking

Policy Statement



Introduction

This Modern Slavery and Human Trafficking Policy Statement relates to actions and activities during the financial year ended 31 December 2024.

The statement sets down SPP Pumps Limited's ("the Company") commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational Structure and Supply Chains

This policy statement covers all the activities of the Company and its subsidiaries. It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all suppliers, contractors and agents to comply with the Modern Slavery Act 2015 and to demonstrate a zero-tolerance approach to exploitation.

The Company is global and currently has operations in the UK, France, North America, and the Middle East. It is part of the wider Kirloskar Brothers Group, which has operations in India, Thailand, South Africa, Egypt and the Netherlands.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policies: The Head of HR is responsible for creating and reviewing policies, which are approved by the Board of Directors. The process by which policies are developed is by looking at current best practice, taking legal advice as appropriate and adapting to the needs of the Company.
- 1.2 Due diligence: our Business Unit Managers and Head of Purchasing & Logistics are responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all Procurement, Human Resources and Commercial staff to familiarise themselves with our policies and complete appropriate Company E-Learning modules.

Policies

The Company is committed to ensuring that there is no instance of slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.



The following policies and terms of business set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:


- 2.1 **Whistleblowing policy** – The Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Dignity at Work and Equal Opportunities Policies** – These policies set down the actions and behaviors expected of employees when representing and working within the company.
- 2.3 **Corporate Social Responsibility (CSR) Policy** – The Company’s CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.
- 2.4 **Terms & Conditions of Purchase** – Our Terms and Conditions of Purchase contain our Code of Conduct which defines the basic requirements placed on the Company’s suppliers concerning their responsibilities towards their stakeholders and the environment.

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

During the financial year ending 31 December 2024, there were no reports or findings of the presence of modern slavery or human trafficking in our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 31 December 2024.

It was approved by the Board on 29 April 2025 and signed on its behalf by:

Name: Robert Tichband
Position: Chief Operating Officer
Signature: 
Date: 29-4-25