

GP/HR/31

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1 Policy Statement

- 1.1 We are committed to opposing and preventing slavery and human trafficking in any form, from any of our corporate activities, and demand the same attitude of all who work for us and expect it from all with whom we have business relationships and dealings.

2 Anti – slavery and human trafficking policy

- 2.1 This policy relates to actions and activities during the period 1 January 2018 to 31 May 2019.

3 Introduction

- 3.1 This statement sets out the actions of Workdry International Ltd and its subsidiary companies, including Selwood Ltd, to understand all potential modern slavery or human trafficking risks related to its business and to put in place steps aimed at preventing slavery or human trafficking in its business and supply chains.

4 Organisational structure and supply chains

- 4.1 Selwood Ltd, Siltbuster Ltd and SPS are separate legal entities owned by Workdry International Ltd. Selwood Ltd employs just under 600 people, and Siltbuster / SPS Ltd employs just under 100 people. Workdry International Ltd does not provide goods or service or employ anyone.
- 4.2 Selwood Ltd are world leaders in pump manufacturing, the leading pump rental solutions company in the UK and a renowned supplier of plant and construction equipment for hire and sale. Siltbuster Ltd, incorporating SPS Ltd, is the UK's number one water treatment solutions for the construction industry, municipal, industrial and mining sectors.
- 4.3 We recognise that we have a responsibility to take a robust approach to slavery and human trafficking.
- 4.4 Our goods and services are sourced mostly from within the UK and EU. Trading with multiple worldwide sectors we maintain relationships with many different organisations and recognise that goods or services supplied from sources outside of these areas are potentially more at risk from slavery/human trafficking issues.

5 Responsibility

- 5.1 The Board of Executive Directors has overall responsibility for ensuring this policy and its implementation comply with our ethical and legal obligations. They will review the

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policy annually as a minimum, after seeking expert advice and guidance to ensure it remains compliant and effective.

- 5.2 Ultimately responsibility for following the organisation's anti-slavery initiatives rests with the Business Unit Leadership Teams. This will include extending the use of the Critical Supplier Questionnaire and conducting human rights and modern slavery risk assessments when assessing suppliers of goods or services, where it is considered to be a potential risk.
- 5.3 The Quality, Health, Safety and Environmental department will be responsible for any investigations and due diligence in conjunction with the relevant Business Unit Managing Director.
- 6 Implementation and operation of the policy
 - 6.1 We will ensure that our approach to the identification of modern slavery risks and steps to be taken to prevent, uncover, and report slavery and human trafficking is incorporated into our operations.
 - 6.2 Suitable material will be sourced to raise awareness within the Business Unit Leadership teams, enabling them to carry out their responsibilities and, where appropriate, to help suppliers better understand and respond to the identified slavery and human trafficking risks.
 - 6.3 We actively encourage all our employees, customers and other stakeholders to report any concerns related to the direct activities or the supply chains of the business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Employees, customers or others who have concerns can complete our confidential disclosure form available on our website or contact the Modern Slavery helpline on 0800 0121 700.
 - 6.4 **Employee code of conduct:** The disciplinary policy makes it clear to employees the actions and behaviour expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating within the UK, abroad and managing our supply chain.
 - 6.5 **Supplier code of conduct:** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Where considered appropriate suppliers are required to provide, via the Critical Supplier Questionnaire (PQ52), that they take steps to prevent the exploitation of workers and adoption of the Ethical Trading Initiative Base Code within their wider supply chain.
 - 6.6 **Recruitment policy:** We adhere to the New National Living Wage. Vacancies are advertised on the Selwood (Workdry International Ltd) website and applications welcomed from candidates in accordance with the Equal Opportunities Policy who meet the relevant criteria. Candidates are required to supply at interview evidence of

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their right to work in the UK and other documentation such as employment references, qualifications, training and driving licence are validated as required.

- 6.7 **Agency workers:** We only use reputable employment agencies to source labour, ideally those with membership of the Recruitment and Employment Confederation. We require transparency from the agency regarding the rate it is paying the temporary worker(s), and always requires the agency workers to be background reference checked i.e. to ensure they are free and legally able to work in the UK; their previous employment history has been verified along with their qualifications, training, and driving licences where applicable.

7 Due Diligence

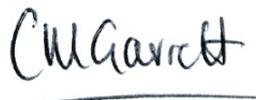
- 7.1 We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. The due diligence and reviews consist of evaluating the modern slavery and human trafficking risks of new suppliers, by conducting supplier audits or assessments through our Business Units supported by our QHSE, or external, auditing processes with a greater degree of focus on slavery and human trafficking where general risks are identified.

8 Actions taken during 2018/2019

- 8.1 The need for a Head of Supply Chain role was agreed during 2018 and we appointed an experienced supply chain professional to the role in November 2018. Since then we have developed a Supplier Management Manual to enable us to work with our suppliers in a consistent and best practice manner. The Supplier Code of Conduct within the manual aims to raise awareness amongst current and potential suppliers to ensure our supply chain is free from modern slavery.
- 8.2 Suitable e-learning material has been sourced and will be issued to Executive Directors, Business Unit Directors, Head of Supply chain and any other relevant staff as deemed appropriate.

9 Review

- 9.1 This Statement and Policy has been reviewed and approved by the Workdry International Board of Directors. It will next be reviewed by March 2020.



Director's signature:

Director's name:

Date: July 2019

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