

Modern Slavery and Human Trafficking Policy

Policy Statement

Primary Water Solutions is committed to the highest of ethical standards and adopts a zero tolerance approach to modern slavery and human trafficking. We define modern slavery as and consider it to encompass:

- Human trafficking
- Forced work through mental or physical threat
- Being owned or controlled by an employer through physical or threat of abuse
- Being treated as a commodity or being bought or sold as property
- Being constrained or having restriction placed on freedom of movement

Modern Slavery and Human Trafficking Prevention

We engage with all areas of our business and supply chain to encourage them to evaluate and improve transparency and accountability to eradicate modern slavery and human trafficking.

We expect all colleagues, subcontractors and supply chain partners to ensure that their goods and materials fully comply with the Modern Slavery Act and are free from ethical ambiguities.

Our procurement activities all take place in the UK and as such are governed by British Law, where predominantly all suppliers used are UK based, not only in their sales but also manufacturing of goods we procure. Therefore, we consider our exposure to modern slavery and human trafficking to be relatively limited. Nonetheless, we have taken steps to ensure that practices do not take place within the business or any business-related activities.

We ensure modern slavery and human trafficking is not taking place in any part of our business or supply chains by:

- Having right to work checks completed at recruitment stage
- Adhering to minimum employment age
- Applying national minimum wage thresholds
- Having regular contact with material suppliers including their understanding of and compliance with our company expectations

We occasionally procure hotel rooms, meeting and conference venues to support business activities. We utilise a selection of trusted providers which have their own processes and procedures in place to recognise and address the risk of modern slavery and human trafficking.

Monitoring and Review

The policy will be monitored against any practical usage of the policy and adjusted accordingly as a live document. The policy will also be subject to annual review or changes in legislation, whichever occurs first.

Signed:



Date: 31.03.2022