Modern Slavery Statement

This Modern Slavery and Human Trafficking report relates to actions and activities of Flowmax Limited and its subsidiary companies ("the Company") during the financial year ending 31 December 2020. It sets out the Company's 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 of care to be alert to risks, however small. Employees are expected to report any concerns and management to act upon them.

The Modern Slavery Act 2015 covers four activities:

Slavery	Exercising powers of ownership over a person.
Servitude	The obligation to provide services imposed by the use of coercion.
Forced or compulsory labour	Work or services exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.

This statement covers all four activities.

Flowmax Limited Business Activities

Flowmax Limited forms part of the SA Bias Industries Group based in South Africa.

Flowmax Limited is an industrial holding company comprising a group of small and medium sized companies in the UK and The Netherlands associated with the manufacture, import and distribution of medium technology fluid handling equipment, consumables, spares and service. Each group company is managed independently and at a local level.

The Company is committed to conducting business in a professional, transparent, ethical manner and to quality assured standards. The Company and all its subsidiaries have a zero-tolerance approach to modern day slavery and human trafficking, both within the Group and in the Group's supply chains.

How is the Modern Slavery Act 2015 relevant to Flowmax Ltd?

Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At a very basic level, preventing exploitation and human trafficking and protecting our workforce and reputation makes good business sense.

The Modern Slavery Act 2015 recognises the important part businesses can and should play in tackling slavery. With this in mind, we will pay close attention to:

- Our supply chain. The Company is committed to mapping the first tier of its supply chain and identifying sectors at risk. This will be published in the appendices to this statement on an annual basis.
- Our recruitment activities. This includes the appointment of suppliers as well as employees. New suppliers will only be approved and appointed following a due diligence process to understand their commitment to ethical business. The majority of our employees are appointed on a permanent basis, and the Company keeps the use of temporary, casual or zero hours workers to a minimum. We will fully comply with, and often exceed, UK employment legislation requirements.
- Payment of suppliers and employees. The Company is committed to operating a fair pricing structure for suppliers and will pay in line with the agreed terms of business.
  All our employee rates of pay exceed the current National Minimum / Living Wage. Salaries will be reviewed on an annual basis and we will ensure employees are fairly remunerated for their contribution to the business in line with markets rates.
- Any outsourced activities. Particularly in jurisdictions that may not have adequate safeguards. We will take a risk-based approach and seek assurance from suppliers and where appropriate verify that their activities are aligned with the objectives of the UK modern slavery legislation.

Responsibilities

Flowmax Limited, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

We will:

- Review our policies and procedures preventing exploitation and human trafficking and protecting our workforce and reputation.
- Ensure our recruitment policy is understood by all involved in the recruitment and selection process and background / right to work checks are carried out consistently.
- Check our supply chains.
- Make appropriate checks on all employees, recruitment agencies, suppliers, etc. to ensure we know who is working for us.
- Ensure we have in place an open and transparent grievance process for all staff.
- Seek to raise awareness so that our colleagues know what we are doing to promote their welfare.

- Make a clear statement annually setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously.
- Demonstrate our dedication and commitment to the prevention of modern slavery and human trafficking by voluntarily registering our policy on the Government's modern slavery statement registry.

Managers will:

- Listen and be approachable to colleagues.
- Respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation.
- Remain alert to indicators of slavery.
- Raise the awareness of our colleagues by discussing issues and providing training so that everyone can spot the signs of trafficking and exploitation and know what we do.
- Use their experience and professional judgement to gauge situations.

All colleagues should:

- Be aware – if you suspect someone is being controlled or forced by someone else to work or provide services, follow our reporting procedure.
- Follow the reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated.
- Tell us if you think there is more, we can do to prevent people from being exploited.

Our Policies

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

The following policies also 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:

Whistleblowing policy – the Company encourages all its workers, customers and other business partners to report and provides a confidential channel to express any concerns related to its direct activities or its supply chains.

Ethical Code of Conduct (ECoC) policy – the ECoC sets out the actions and behaviour expected of employees when representing the Company.

Corporate Social Responsibility (CSR) policy – the Company's CSR policy sets out how we work responsibly with suppliers and local communities.

Grievance procedure – the Company's internal grievance procedure provides employees with the proper channels to raise and escalate concerns.

Recruitment policy – the employee recruitment policy sets out the Company's approach to consistent, transparent, and fair recruitment processes in line with employment legislation.

The Risks

The principal areas of risk we face, related to slavery and human trafficking include:

- Supply chains
- Recruitment activities

The Company is committed to assessing these risks and has adopted the following mitigation measures:

- Ensuring consistent recruitment processes are adopted across the Company
- Providing hiring managers with support during the recruitment process
- Completing additional recruitment checks when using third parties to recruit
- Having a clear understanding and awareness of our supply chains
- Carrying out risk assessments to identify potential areas of risk when appointing new suppliers

Due Diligence Processes

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. We will operate an ongoing human rights due diligence process in line with the UN Guiding Principles on Business and Human Rights to identify, prevent, mitigate and account for how we address our impacts on human rights.

The Company maintains an awareness of the risks linked to modern slavery including high risk sectors, lack of regulation in source countries, complex employment arrangements, presence of vulnerable workers and the absence of worker representation and rights. This is factored into our risk assessments which are completed and reviewed on an annual basis.

The Company builds long-standing relationships with its primary suppliers and makes clear our expectations of business partners. We evaluate the modern slavery and human trafficking risks of each new supplier and invoke sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Training

The Company will provide specialist training to those employees who are involved in managing recruitment and our supply chain. This training will include raising awareness of the signs of modern slavery, identifying risks and information about how to raise complaints within the Company.

More general awareness training is provided to all employees by providing easy access to information via media most appropriate to the recipient.

Any at risk groups identified by the Company will receive adequate training to ensure they are fully aware of their rights and how to access the Company's grievance procedure.

Performance Indicators

The Company will use key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including**:**

- Annual payroll reporting.
- Employee modern slavery training
- Supplier auditing.

Our established KPI's and the results for the year ending December 2020 are detailed in Appendix 1.

Approved by Flowmax Board of Directors

Date: 30/06/21 .....

Signed: .....

Graham Morrell – CEO Flowmax Group

Date of next review: 30/06/22 .....

Appendix 1

2020 Actions

- We committed to preparing appropriate KPI's and reporting on the Companies performance in three key areas: Supply Chains, Training, Payroll Reporting.

- Audit supply chain:
  The Company is committed to mapping the first tier of its supply chain and identifying sectors at risk and put in place relevant mitigation measures. We expect to be able to publish this information in the policy statement each financial year.

  For the year ending December 2020 we identified the following:

  364 Suppliers accounted for 80% of the Company's total annual purchases.
  Of these, 10% were identified as being 'at risk'.
  Further investigation is ongoing with those suppliers identified as "at risk".
  61 new suppliers opened purchasing accounts during the year ending December 2020.
  Of these, risk assessments were completed for 20% and 0 were identified as being 'at risk'.

- Payroll Reporting:
  - 45 new employees were recruited in the last 12 months (up to 31st March 2021)
  - Only 1 of these employees was recruited on a temporary contract.
  - 11% of new employees were recruited using an agency.
  - All new employees were paid at least the national minimum wage.
  - The Company reviewed right to work checks to ensure that 100% of successful candidates demonstrate a right to work in the UK on joining the Company in the year ending December 2021.

- Employee modern slavery training:
  - Training provided for the lead directors / managers at each company site.

Appendix 2

Action Points 2021

- Recruitment & Employment
  - Obtain support from the Companies outsourced HR Provider when recruiting to ensure a best practice approach is followed.
  - Involve outsourced HR provider in new starter onboarding to ensure consistency and compliance in all cases.
  - Ensure all new employees and agency workers receive the national minimum wage as a minimum.

- Training
  - Identify employees involved in recruitment activities.
  - Identify employees who are involved with suppliers, including recruitment agencies.
  - Extend modern slavery training to all identified employees.

- Suppliers
  - Revisit and update top 80% of products suppler list and assessment
  - Complete a second level assessment for “at risk” suppliers.
  - Identify whether supplier is on the government registry.
  - Ask companies to ensure new suppliers have a first stage assessment as a minimum.