

1. Introduction

The UK Modern Slavery Act 2015 (the "Act") requires certain businesses to provide public disclosures regarding efforts to eradicate slavery and human trafficking from their supply chains. This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by HSP Valves Holdings Limited and other relevant group companies to prevent modern slavery and human trafficking in our business and supply chains. It also outlines HSP's commitments towards eliminating the risk of modern slavery in our supply chains for the future.

Modern Slavery is an international crime adversely affecting tens of millions of people around the world. Slavery, servitude, forced labour, bonded labour, and human trafficking are issues of increasing global concern, affecting all sectors, regions, and economies. Modern slavery is fundamentally unacceptable within our business and supply chain, and combatting it is an essential element of our overall approach to business and human rights.

HSP Valves commitment to a strong compliance culture is fundamental to our growth as a specialised products distributor in the energy industries. Below please find details of our policies, procedures, and practices that HSP is either beginning to implement, or has already implemented, to support in the eradication of slavery and human trafficking from our supply chain.

2. Corporate Structure

HSP is a global distributor of valve and automation products for worldwide energy markets. HSP operates with a distribution platform that expands across the Europe, the Middle East, and the Asia Pacific region. We are committed to conducting business ethically and to adopting procedures that contribute to ensuring that modern slavery or human trafficking does not occur in our own business or in our supply chains.

We have in place several Company and Group policies, procedures and training which address issues relevant to modern slavery and human trafficking, including.

- Group Code of Conduct and Ethics
- Group Policy on Equality, Diversity & Inclusion (EDI)
- Group Whistle Blower Policy and procedure
- Written employment practices and procedures which ensure fair recruitment and treatment of employees
- Whistleblowing training to encourage employees to report concerns of malpractice, this would include any concerns related to slavery and human trafficking issues
- Supplier Code of Conduct
- Supplier Evaluation processes

3. Workers

We are committed to ensuring that all workers, whether directly employed or part of our supply chain, meet the minimum legal age for employment and are paid at least the applicable National Minimum Wage or National Living Wage as set by the applicable country laws.

We do not tolerate the use of child labour or any practices that exploit vulnerable individuals. We expect all our suppliers and partners to comply with these standards and to maintain appropriate documentation to verify compliance.

4. **Customers & Suppliers**

HSP will continue our commitment by rolling out our due diligence process by further engaging with members of our executive, legal, compliance, sourcing and quality teams to identify Suppliers which may be considered medium or high-risk to human trafficking or modern slavery.

We will undertake a collaborative approach with our supply chain to ensure all Suppliers understand and commit to their obligations under the Modern Slavery Act.

HSP's current Supplier evaluation processes will be expanded to include reviewing compliance with the Modern Slavery Act obligations of our supply chain.

5. **Training**

We provide training to ensure that our staff understand the risks of modern slavery and human trafficking in our business and supply chains.

6. **Other Policies**

Employees are encouraged to read this policy in conjunction with other relevant Company policies, including but not limited to:

- Whistleblowing Policy
- Bullying & Harassment Policy
- Equality, Diversity & Inclusion Policy
- Anti-Bribery & Corruption Policy
- Corporate Social Responsibility Policy
- Code of Conduct & Ethics Policy
- Quality Policy
- Environmental Policy
- Health & Safety Policy

REVISION HISTORY				
Rev.	Effective Date	Description	Code	Owner
00	May 2022	Policy Created	HR-PO-GP-008	Derrick Mackenzie – MD
01	April 2023	Policy reviewed	HR-PO-GP-008	Derrick Mackenzie – MD
02	June 2023	Policy amended format	HR-PO-GP-008	Derrick Mackenzie – MD
03	3 rd December 2025	Reviewed & updated new sections 3,4, 5 & 6	HR-PO-GP-008	Derrick Mackenzie – MD
04	11 th Feb 2026	Reviewed and update section 2 & 6	HR-PO-GP-008	Derrick Mackenzie – MD

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