



## MODERN SLAVERY POLICY STATEMENT

### 1. MODERN SLAVERY ACT 2015 STATEMENT

This statement sets out the steps that Drilling & Pumping Supplies Ltd (DPS) have taken to mitigate the risk of slavery and human trafficking occurring within any part of our business or our supply.

### 2. OVERARCHING STATEMENT

Slavery and human trafficking are abuses of a person's freedoms and rights. We are totally opposed to such abuses in our direct operations, our indirect operations and our supply chain as a whole.

### 3. MEANING OF SLAVERY AND HUMAN TRAFFICKING

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 and is guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation (ILO) particularly relating to forced or compulsory labour.

Modern slavery covers slavery, servitude, forced or compulsory labour and human trafficking.

- Slavery - behaving as if you own (have legal right over) another person and thus depriving them of their freedom.
- Servitude - obliging another person to provide services through coercion and without the possibility of changing their condition.
- Forced/compulsory labour - obliging another person to provide work or a service under the menace of a penalty and for which the person has not offered him/herself voluntarily.
- Human trafficking - arranging or facilitating the travel of another person with a view to that person being exploited.

### 4. OUR BUSINESS

DPS is a well-established company in the Water and Wastewater Pumping and Treatment industry having been in existence since 1983 (incorporated 1991).

DPS is a highly experienced and proven provider of water and wastewater treatment and pumping solutions. Our solutions range from the complex municipal and industrial projects to

the single domestic units. Our clients range from homeowners to large multinational and municipal authorities.

We operate in Ireland, the UK and mainland Europe. We provide a service to the municipal, industrial, commercial, agricultural and domestic sectors.

Our flexible customer focus and innovative approach, coupled with our commitment to health and safety, quality and the environment, make us a trusted and reliable partner for all your water treatment and pumping related needs.

## **5. OUR SUPPLY CHAINS**

We purchase the majority of our raw materials and components from third-party suppliers, mainly through leading international companies. Our products are sourced from various countries including Italy, Germany and France.

For the purposes of this statement, we report on DPS taken within our supply chain, by which we mean those suppliers to the Group with whom our organisation deals directly. We also report on those steps taken within such supply chains that have indirect effects on the wider supply chain.

## **6. RELEVANT POLICIES**

In keeping with our commitment to act with integrity in all our business dealings, many of our existing policies are relevant to ensure that there is no slavery or human trafficking in any part of our business or our supply chains.

In our Employee Handbook relevant sections cover the following key policies,

- Standards of performance and behaviour at work
- Valuing Diversity
- Dignity at work

Our Employee Handbook sets out the behaviours we expect from employees in their dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisers, governments and competitors. All employees and suppliers are expected to act with integrity in accordance with the standards of behaviour set out in the handbook.

We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions and the above policies. We encourage employees to raise any concerns that may have regarding the above policies.

We believe in the business benefits brought about by diversity and equal opportunity. We therefore support collective bargaining for our own employees and through our supplier standards.

We actively support employee engagement, representation, dialogue and the ability of an employee to raise potential concerns or grievances. Freedom of association and the right to collective bargaining is a core labour standard that we respect as guided by the International Labour Organization (ILO). We apply our employment practices in line with, and in certain aspects exceeding the requirements of, local legislation.

## **7. RISK ASSESSMENT AND DUE DILIGENCE**

The risk of slavery and human trafficking within our own organisation is avoided and mitigated as a result of strict policies and procedures as well as the oversight built into our business operations and the knowledge and skills of our staff. We assess risk based on the US Department of Labour TVPRA List of Goods Produced by Child or Forced Labour. We screen suppliers to identify and evaluate human trafficking and slavery risks. This includes geographic location, manufacturing processes, history of human trafficking and slavery in the region, and the U.S. Dept. of Labour's list of goods produced by Child or Forced Labour.

DPS formally review all contractors and suppliers before appointment and this review includes a questionnaire section on Corporate and Social responsibility which includes questions designed to establish the procedures and controls in place to prevent Modern Slave in our suppliers and contractors.

## **8. TRAINING AND AWARENESS**

All employees are given training in Human Rights awareness and DPS' commitment to ethical behaviour in all company activities.

## **9. EFFECTIVENESS AND PERFORMANCE REVIEW**

We do not have key performance indicators specifically in relation to slavery or human trafficking as any instance would be expected to be a non-compliance and breach of employment laws, our direct employment practices, wider Group policies and / or supplier standards.

Signed:

  
Aidan McGinley

10th May 2023

Rev 2