

SHEQ-PO-01.5 Modern Slavery Policy

Context

AVK UK Ltd is part of the family owned AVK Group with headquarters in Skovby/ Galten in Denmark. The AVK Group consists of more than 100 production and sales companies worldwide and employs more than 4,575 people. The AVK Group recognises their responsibilities as a global engineering group, to ensure that slavery and human trafficking is not occurring in any part of our business or supply chain.

AVK UK Ltd is the UK's leading supplier of valves and fittings for the water, sewage, and gas distribution industries. Their product program comprises a large range of valves, hydrants, pipe fittings and accessories each complying with the highest standards of safety and durability.

The products they manufacture play a vital role in community infrastructure and contribute positively to climate and environmental protection through their focus on high functionality, high quality and a long durability.

Glenfield Invicta is part of the AVK Group. Although Glenfield Invicta Limited's turnover does not exceed the £36M threshold turnover in the Modern Slavery Act 2015 requiring a statement concerning the steps the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place, we do acknowledge and recognise our obligations in this regard as a reputable supplier into the UK Water and Gas utility industries.

Policy

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Glenfield Invicta has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Direct Activities

Information on Glenfield Invicta's organisation structure can be found on our website <https://www.glenfieldinvicta.co.uk>

In alignment with the AVK Group, Glenfield Invicta Ltd abide by the Group Corporate and Social responsibility policy as detailed in our Group website www.avkvalves.com/en/downloads (Sustainability report).

Within AVK UK Ltd, we can further confirm that we comply with the principles of SA8000 i.e.

- **Child Labour:** No use or support of child labour within our business
- **Forced and Compulsory Labour:** No use or support for forced or compulsory labour; no required 'deposits' - financial or otherwise; no withholding salary, benefits, property or documents to force

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personnel to continue work; personnel right to leave premises after workday; personnel free to terminate their employment; and no use nor support for human trafficking.

- **Health and Safety:** Provide a safe and healthy workplace; prevent potential occupational accidents; appoint senior manager to ensure OSH; instruction on OSH for all personnel; system to detect, avoid, respond to risks; record all accidents; provide personal protection equipment and medical attention in event of work-related injury; remove, reduce risks to new and expectant mothers; hygiene- toilet, portable water, sanitary food storage; decent dormitories- clean, safe, meet basic needs; and worker right to remove from imminent danger.
- **Freedom of Association and Right to Collective Bargaining:** Respect the right to form and join trade unions and bargain collectively. All personnel are free to: organize trade unions of their choice; and bargain collectively.
- **Discrimination:** No discrimination based on race, national or social origin, caste, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age. No discrimination in hiring, remuneration, access to training, promotion, termination, and retirement.
- **Disciplinary Practices:** Treat all personnel with dignity and respect; zero tolerance of corporal punishment, mental or physical abuse of personnel; no harsh or inhumane treatment.
- **Working Hours:** Compliance with laws & industry standards; normal workweek, not including overtime, shall not exceed 48 hours; 1 day off following every 6 consecutive workdays, with some exceptions; overtime is voluntary, not regular, not more than 12 hours per week.
- **Remuneration:** Respect right of personnel to living wage; all workers paid at least legal minimum wage; wages sufficient to meet basic needs & provide discretionary income; deductions not for disciplinary purposes, with some exceptions; wages and benefits clearly communicated to workers; paid in convenient manner – cash or check form; overtime paid at premium rate; prohibited use of labour-only contracting, short-term contracts, false apprenticeship schemes to avoid legal obligations to personnel.

Supplier Engagement

Glenfield Invicta recognises the importance of choosing the right suppliers with a focus on quality and responsibility. Therefore, we have a set of formal requirements related to responsibility for all our suppliers and we work systematically with registration, control, follow-up and development of the individual supplier collaborations. In addition, compliance with the AVK Group’s policies including Code of Conduct for suppliers is included in the assessment of external suppliers.

Furthermore, our suppliers are obligated to comply with Glenfield Invicta’s requirements for social responsibility and our environmental Code of Conduct. Glenfield Invicta make an active effort to ensure compliance with human rights principles including the effort to ensure that no suppliers use child labour, forced labour or have a negative environmental impact.

All this is ensured via continuous supplier visits and audits. As part of our work with responsible supply chain management, Glenfield Invicta has established a supplier Code of Conduct within central areas such as environment and climate, human rights, work standards and anticorruption. This Code of Conduct describes Glenfield Invicta’s values and is clearly communicated to our suppliers. The Code of Conduct is also integrated in the purchase agreements with suppliers and accepted in all purchase orders.

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We continuously carry out compliance audits at our suppliers with a special focus on those countries where there is found to be a higher risk in terms of responsible social and environmental conduct. Our supplier Code of Conduct is signed by all Chinese suppliers and is part of our standard purchase conditions. In the case of non-compliance with our Code of Conduct, we will without hesitation take the necessary actions to deal with this. In the case of repetitive non-compliance, the supplier collaboration will be terminated.

Recruitment and Temporary Workers

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

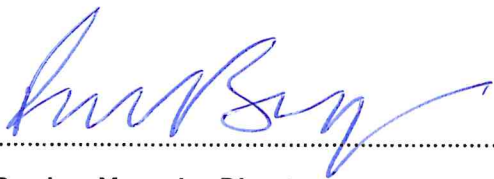
We have included our Supplier Code of Conduct into our employee agency contracts and only those who have signed these terms can be used to source temporary staff. Annual confirmation of adherence to our Supplier Code is required from all approved agencies. Managers have been advised of our Modern Slavery controls in relation to the recruitment of temporary staff or contractors.

Training and communications

Glenfield Invicta Ltd trains all new employees on key code of conduct policies which include this policy on Modern Slavery. All employees will be reminded of the code of conduct policies in a Core brief at least once per year.

We have an effective Whistle blowing policy in our business which would provide specific protection for anyone who uncovers and reports on any situation which might be regarded as being in breach our Modern Slavery Policy.

The company directors take responsibility for the implementation of this statement and its objectives and will provide adequate resources (training etc.) and investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chain.



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Paul Boyden, Managing Director

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