

Modern Slavery Policy and Statement for Financial Year 2021 - 2022

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Flowline Group has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Flowline 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.

Our business

Flowline is a modern, dynamic and growing company providing specialist drainage inspection, maintenance and repair services to public and private sector clients.

Our vision is to be the leading drainage contractor in London and the South East.

We deliver a broad range of services across public highway drainage systems, public sewer systems, rail drainage networks and private drainage/sewer systems including CCTV Surveys, Asset Surveys including HADDMS, Gully & Catchpit Cleaning, High Pressure Water Jetting (HPWJ), Liquid Waste Tankering and Relining & Rehabilitation.

Our high risk areas

Our biggest risk of non-compliance is through our supply chain - i.e. those organisations providing us with products such as plant, equipment and vehicles.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. This Anti-slavery policy. This policy sets out the Flowline's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. 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.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our suppliers

Flowline operates a supplier policy and maintains an approved supplier list. We conduct due diligence on all suppliers before allowing them to become an approved supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Our improvements for 2019/20

- Training, Copies of the Home Office booklet available to all staff. A Toolbox Talk to be delivered during the annual TBT program.
- Supply Chain, New suppliers completing Modern Slavery Risk Assessments during approval process and all existing suppliers completed retrospectively.

Approval for this statement

Signed:

Thierry Bouzac – Executive Chairman

Date: April 2021

Review date: May 2022