



Flush-Line Group Ltd.

Policy 004:

Ethical Trading & Modern Slavery 2024

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1.1 Statement

This Ethical Trading and Anti-Slavery Policy statement exists to set out the responsibilities of Flush-Line Group Limited ("Flush-Line ", "the Company") and those who work for us regarding observing and upholding the highest ethical standards of business practice.

We will meet the requirements of all relevant UK, EC & EEC Legislation and directives relating to the human rights of its workforce and business practice. This policy also sets out the steps that Flush-Line will take to ensure that modern slavery and compulsory labour have no place within our operations, as set out in the Modern Slavery Act 2015.

This policy statement also acts as an information source to guide those working for Flush-Line Group Limited on understanding their responsibilities regarding the best practices of transparency and integrity in our business dealings and the procedures undertaken to ensure that human trafficking and modern slavery are not taking place within our supply chain.

Flush-Line Group Limited is committed to conducting business ethically and honestly. Flush-Line is committed to implementing and enforcing systems to ensure that the highest standards of business ethics are followed at all times.

Flush-Line personnel will accept, uphold and communicate this policy through colleagues and suppliers to ensure, as far as practicable, that all aspects of the company supply chain are trading ethically and without the impacts of Modern Slavery. Flush-Line personnel will, to this end:

- Liaise and coordinate with occupiers and contractors to verify their acceptance of the policy guiding principles.
- Review the implementation of this policy.
- Review and update the content of this policy annually for continual improvement.

Proper implementation and application of this Policy by everyone is paramount. All Flush-Line personnel are required to comply with the terms of this Policy and any related arrangements or policies and to enforce and cooperate with management in the implementation of this Policy. The ultimate responsibility for overseeing the implementation of this Policy rests with the Company Director.

1.2 Scope

This Policy applies to all employees, subcontractors, agency workers, and third parties completing work on behalf of Flush-Line Group Limited or commuting to and from the place of work. It covers our work directly, the control we exercise over the site where we operate, and the persons who may be affected by our activities. This policy shall be communicated to all entities involved with our working process and will be reviewed annually or sooner when necessary.

2 ETHICAL TRADING

Flush-Line Group Limited's Ethical Trading Policy encompasses the following principles and procedures, which are rigorously applied within our organisation and expected from all suppliers, subcontractors and other persons doing business with us.

- Employment is freely chosen.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic.
- Child labour shall not be used.
- Living wages are paid.
- Working hours are not excessive.
- No discrimination is practised or tolerated.
- Regular employment is provided.
- No harsh or inhumane treatment is allowed.
- An Anti-Slavery Policy exists to underpin these initiatives.
- Robust recruitment procedure
- Anti-corruption and whistleblowing policies and procedures to support ethical trading.

2.1 Fairly Traded Goods

We are committed to paying the fair market price for the goods and services and ensuring that the products we purchase and sell are correctly specified and are of good value both to the seller and purchaser.

2.2 Counterfeit, Fraudulent and Suspect Items (CFSI)

We are aware that using counterfeit items can seriously affect the quality of the work we deliver due to substandard quality control. Flush-Line Group Limited will not countenance the resulting structural failure, the possible loss of life, and the significant additional costs this may cause. To this end, we only choose suppliers that can demonstrate the quality and source of the goods we require.

All personnel involved in purchasing goods have been informed about the potential risks of CFSI and are advised that all goods must be purchased directly from the manufacturers or from agreed and official distribution channels.

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ANTI-SLAVERY

3.1 Modern Slavery

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour whereby individuals are deprived of their freedom and are exploited for commercial or personal gain.

Flush-Line Group Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, 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 within the business or our supply chain. We expect the same high standards from all our staff, suppliers, contractors, and those with whom we do business. We will undertake all necessary and practicable steps to ensure that our standards are being implemented throughout our supply chain.

If any suggestion or evidence indicates potential modern slavery within our supply chain, it will be taken seriously. Trading with relevant entities may be suspended if the evidence is compelling, and appropriate legal action will be investigated. An internal investigation into the circumstances which allowed the situation to arise will be instigated. If a more robust screening process is recommended, systems will be implemented to achieve such.

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ARRANGEMENT

4.1 Suppliers

Flush-Line Group Limited acknowledges the risk that a supply chain may involve a hidden or unknown subcontractor reliant on forced labour. Although we consider the risk of modern slavery to be low due to the nature of our supply chains, we take our responsibilities to combat modern slavery seriously. The prevention, detection, and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for Flush-Line or under our control.

Flush-Line Group Limited operates a Procurement Procedure and subcontractor Prequalification Procedure and maintains an Approved Supplier List. Flush-Line Group utilises the services of CHAS to onboard and monitor subcontractor prequalification procedures and management.

We conduct due diligence on all suppliers before allowing them to become approved suppliers, requiring that they confirm to us that they have taken steps to eradicate modern slavery within their business and hold their suppliers to account for modern slavery.

- All supply chain lines must be continually risk assessed and managed in relation to modern slavery and any high-risk suppliers audited.
- Flush-Line encourages anyone to raise concerns about modern slavery and will support anyone who acts in good faith.
- Wherever possible, Flush-Line will obtain assurances from suppliers that they are free of modern slavery.
- We ask that all suppliers provide evidence of policies or processes in place in their organisation to reduce the risk of modern slavery or request that they agree to comply with our own policy.
- Flush-Line Group have equal opportunities policies and is committed to upholding human rights.

- Flush-Line Group Limited will continue developing our commitment to combat modern slavery and provide staff training where appropriate.
- When taking on direct labour, we will ensure this labour is made aware of our commitment to anti-slavery & anti-trafficking – we will, through the recruitment process, seek confidence that the work is being undertaken through free will.

4.2 Training and Consultation

We regularly engage with all relevant management and staff members and ensure that our policies reach every team member in order that they understand the signs of modern slavery and what to do if they suspect that there is any risk of it taking place within any area of our business or our supply chain.

Training for staff will be delivered in multiple formats.

- Poster will be displayed in and around the site and welfare.
- Toolbox talks will be delivered to explain further modern slavery and what it looks like in the modern world.
- Online training will be delivered so operatives can train when they have appropriate spare time.
- There is a 24-hour helpline which is free to all employees where concerns, in general but including modern slavery, can be discussed.
- Flush-Line has a QR code incident line where anything from near-miss reporting to concerns in and around modern slavery, whistleblowing, and bullying can be reported should the individual not feel that they can discuss without the fear of reprisal.

4.3 Performance Indicators

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

- No reports are received from personnel, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- We achieve a level of communication and personal contact with every team member and their understanding of, and compliance with, our expectations regarding modern slavery.

4.4 Policy Review

This policy and its implementation and communication will be reviewed at a minimum annually or at any time prior to that where there are indications that a review is required.

Brett Boyer **Managing Director**

FLUSH-LINE GROUP LTD.

DATED: 05/01/2024

REVIEW: Annual

SIGNED:  _____

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