

Aspen Pumps Ltd. Modern Day Slavery Act (2015) 2019 Statement

Introduction

This statement is made by Aspen Pumps Ltd. in compliance to section 54 of the Modern Slavery Act 2015 (MSA) and applies to all parent companies and subsidiaries (as defined in the Aspen Pumps Ltd. Structure).

This statement will be reviewed and updated annually to reflect the Group status and is available on our website or by request.

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. The Group is committed to identify risks of modern slavery and human trafficking throughout its supply chain and continually works with its suppliers to ensure transparency in the supply chain.

Our Pledge

Aspen Pumps Ltd. is committed to comply fully with applicable human rights legislation in the countries we operate. For all matters relating to human rights, we will comply with local laws and if those laws provide lesser protection than UK law, we will apply the principles enshrined in UK law.

As part of our ongoing due diligence process which has taken place during the previous financial year, supplier approval is carried out throughout the Group. The following controls are being put in place to mitigate potential risk from within the Group and from those organisations, we interact with:

- We will define ownership of modern slavery processes at each of our companies and will work with them to implement this statement
- We will strive to include modern slavery discussions within all our supplier visits
- We will work closely with our supply chains to ensure compliance with legislative obligations and expect those organisations to have suitable anti-slavery and human trafficking policies and processes.
- We will request that our suppliers complete 'Supplier Modern Slavery Self-Assessment Declaration'
- We aim to introduce independent modern slavery audits (especially in countries where the risk of modern slavery is much higher).

Our Organisation and its Structure

Aspen Pumps Ltd. was established in 1992 and sells Aspen Pumps, Xtra and Big Foot Systems products. It operates in the UK and abroad, and is primarily based in the South East of England. In 2015 funds managed by 3i investments plc (a multinational private equity and venture capital company based in London, United Kingdom) acquired a majority stake in the ultimate holding company of Aspen Pumps Ltd.

Aspen Pumps Ltd now encompasses separate legal entities, operating directly in the following countries:

1. Australia
2. France
3. Germany
4. India
5. USA
6. United Kingdom

Aspen Pumps Ltd is the parent company of the Group and employs approximately 175 employees group wide. More information about our group structure is available at www.aspenpumps.com

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Relevant Policies

Aspen Pumps Ltd. has clear policies in place to further mitigate and demonstrate our commitment to combatting modern slavery and these policies are outlined below:

- **Whistleblowing Policy**
Aspen Pumps Ltd. operates a whistleblowing policy. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in our supply chain. We aim to encourage every employee to speak up about genuine concerns in relation to criminal activity.
- **Corporate Social Responsibility & Ethics Policy**
Aspen Pumps Ltd. is fully committed to being an equal opportunities employer. Trust, honesty and integrity are paramount to our organisation and we are opposed to all forms of discrimination.
- **Anti – Bribery Policy**
Aspen Pumps Ltd. operates on an ethical basis in all of its activities and takes all reasonable steps to ensure bribery is prevented, either by those working for the organisation or associated with it, including third parties and agents. Aspen Pumps Ltd. therefore has in place procedures and systems to prevent and detect corruption and bribery.
- **Equal Opportunities Policy**
Aspen Pumps Ltd. are aware of issues relating to discrimination, harassment and victimisation and have taken the necessary measures to make sure it does not happen within the organisation. Aspen Pumps Ltd. employees are paid at least the living wage, which shows a commitment to avoiding labour exploitation within our businesses.

Managing Risk

Aspen Pumps Ltd. does not wish to be associated with any organisation that either has or is found to be involved with human trafficking or modern slavery. If we were to find evidence that one of our suppliers has failed to comply with Modern Slavery Act 2015 then we would require the relevant supplier to remedy such non-compliance and would consider terminating our relationship should we see no substantial improvement in the way their business is conducted.

We currently conduct limited audits on our suppliers from a modern day slavery perspective. However as part of Aspen Pumps Ltd. efforts to monitor and reduce the risk of modern day slavery and human trafficking occurring through the supply chains, we regularly send out 'Modern Slavery Self-Assessment Declaration' to our suppliers to reinforce and strengthen our commitment to eliminating modern slavery.

Supplier Adherence to our Values

In order to ensure that all persons within our supply chain comply with our values and zero tolerance policy on modern slavery, we have implemented a 'Modern Slavery Self-Assessment Declaration' to assess and monitor our suppliers conduct.

Aspen Pumps Ltd. Objective is to introduce Modern Day Slavery supplier audits throughout the Group supply chain. We therefore expect our suppliers to comply with those provisions laid out in the act and hold their own suppliers to the same high standards.

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Training and Awareness

In order to assess our effectiveness for preventing modern slavery, we will review and develop the following key performance indicators and will report them in future Modern Slavery statements:

- Implement training for key members of staff who manage supplier relationships and who are responsible for managing investments in companies who have a potentially higher risk of slavery, throughout the Group.
- Implement actions to strengthen our risk assessments and supply chain mapping

Review Status

The following developments have been realized since the last review:

- Modern Slavery statements have been received from our existing UK suppliers who comply with the act.
- We are currently completing a specific modern slavery supplier risk assessment across the supply base.
- Modern slavery self-assessment form will be sent to all suppliers identified from the supplier risk assessment, including on-site audits, where necessary.
- Training and awareness continues to be communicated to all key purchasing staff, throughout the group.
- We continue to achieve the objectives set out in **Our Pledge**

Board Approval

The Company Director(s) are responsible for implementing this policy and continually monitor the level of control required to prevent Modern Slavery and Human Trafficking taking place within the supply chain.

This statement has been approved by the Board of Directors and is for the financial year ending 31st December 2018

Contact

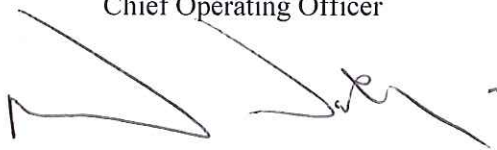
If you have any questions regarding this statement, please address these to supplychain@aspenpumps.com

Company Name: Aspen Pumps Ltd.

Name: Andrew Wakelin

Position: Chief Operating Officer

Signed:



Date: 8th March 2019