

# Anti-Slavery and Human Trafficking Statement

## Statement and Purpose

This statement sets out the actions of Workdry International Ltd and its subsidiary companies, (including Selwood Ltd and Siltbuster Ltd) (our 'organisation') to understand all potential modern slavery or human trafficking risks related to its business and to put in place steps aimed at ensuring there is no slavery or human trafficking in its own business and supply chains.

This statement relates to the actions and activities of Selwood Ltd, Siltbuster Ltd and Workdry International during the organisation fiscal year period of 01 January 2023 to 31 December 2023.

Our annual transparent update as required by law outlines our efforts to combat modern slavery and human trafficking.

Our organisation is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. We recognise that we have a responsibility under the Modern Slavery Act 2015 to take a robust approach to slavery and human trafficking and the organisation demands the same attitude of all who work for us and expect it from all with whom we have business relationships and dealings.

## What Do We Mean by Modern Slavery?

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- Slavery: where ownership is exercised over an individual.
- Servitude: involves the obligation to provide service imposed by coercion.
- Forces and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them.

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

- Child labour: whilst not always illegal in the jurisdiction in which it takes places, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development. Violence, exploitation, and abuse of children, including sexual exploitation will not be tolerated and any supplier or third party the company has dealing with cease and appropriate action will be taken to inform authorities.

# Anti-Slavery and Human Trafficking Statement

All forms of modern slavery have in common the deprivation of a person's liberty by another to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

## Scope, organisational structure, and supply chains

Selwood Ltd and Siltbuster Ltd are separate legal entities owned by Workdry International Ltd. At the time of publishing this statement. During the financial period mentioned above Selwood Ltd employs 531 people and Siltbuster Ltd employs 87 people. These numbers will fluctuate throughout the year.

Workdry International Ltd does not provide goods or service.

Selwood Ltd are world leaders in pump manufacturing, the leading pump rental solutions company in the UK and a renowned supplier of plant and construction equipment for hire and sale.

Siltbuster Ltd is the UK's number one water treatment solutions company for the construction industry, municipal, industrial, and mining sectors.

## Countries of operation and supply

Our goods and services are sourced mostly from within the UK and EU. Trading with multiple worldwide sectors we maintain relationships with many different organisations and recognise that goods or services supplied from sources outside of these areas are potentially more at risk from slavery/human trafficking issues.

## Implementation and operation of the statement

We will ensure that our approach to the identification of modern slavery risks and steps will be taken to prevent, uncover, and report slavery and human trafficking is incorporated into our operations.

Suitable material will be sourced to raise awareness within each Company's Leadership teams, enabling them to fulfill their responsibilities and, where appropriate, to help suppliers better understand and respond to the identified slavery and human trafficking risks.

We actively encourage all our employees, customers, and other stakeholders to report any concerns related to the direct activities or the supply chains of the business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Employees, customers, or others who have concerns can contact us via our website or contact the Modern Slavery helpline on 0800 0121 700 (<https://www.modernslaveryhelpline.org/>). Concerns can also be reported by going via <https://modernslavery.gov.uk>. There is also an App which can be

# Anti-Slavery and Human Trafficking Statement

downloaded: [Download The App - Unseen \(unseenuk.org\) as well as using this website for further education. Further help may be found with the Salvation Army on 0800 818 3733 and should you suspect a child is in danger of trafficking call NSPCC on 0808 800 5000](#)

## Responsibility

The **Board of Executive Directors** has general responsibility and oversight to ensure that this policy and its implementation complies with our ethical and legal obligations. This statement will be reviewed annually as a minimum, after seeking expert advice and guidance, to ensure it remains compliant and effective.

**Company Leadership Teams** have ultimate responsibility for following the organisation's anti-slavery initiatives including the use of the online supplier pre-qualification questionnaire and risk-based onboarding and evaluation process when assessing suppliers of goods or services, where it is a potential risk.

**The Safety Health, Environmental and Quality department** will be responsible for any investigations and due diligence in conjunction with the relevant Company's (or Business Unit) Managing Directors.

The **HR department** is responsible for making available suitable e-learning which is available to employees involved in the supply chain to better understand the subject and risks of slavery and human trafficking and the department ensures this is updated in line with current legislation.

## Relevant Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing policy:** We encourage all our employees, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for employees and customers to make disclosures, without fear of retaliation.

**Disciplinary policy:** The disciplinary policy makes it clear to employees the actions and behaviour expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating within the UK, abroad and managing our supply chain.

**Bullying and Harassment Policy:** This policy supports this aim by also setting out the steps we will take to investigate and deal with complaints of bullying or harassment, and how we support those affected. One key to protecting our culture and our people is seeking to eliminate bullying or harassment at work.

# Anti-Slavery and Human Trafficking Statement

**Equality, Diversity, and Inclusion Policy** outlines the organisation's commitment throughout everyone's employment lifecycle to equality, diversity and inclusion and sets out how we put this commitment into practice and what behaviours we expect from our people. We believe that having a culture that is diverse, equitable and inclusive is core to everything that we strive to achieve and to the organisational environment we wish to protect.

We adhere to the National Living Wage. Vacancies are advertised on the Selwood Ltd (Workdry International Ltd) and Siltbuster websites and applications welcomed from candidates in accordance with this Policy who meet the relevant criteria. Candidates are required to supply at interview evidence of their right to work in the UK and other documentation such as employment references, qualifications, training and driving licence are validated as required.

**Agency workers:** We only use reputable employment agencies to source labour, ideally those with membership of the Recruitment and Employment Confederation. We require transparency from the agency regarding the rate it is paying the temporary worker(s), and always require the agency workers to be background reference checked i.e., to ensure they are free and legally able to work in the UK; their previous employment history has been verified along with their qualifications, training, and driving licenses where applicable.

## Training

We require all employees working within our organisation to complete training on modern slavery as a e-learning module as part of their induction programme. This e-learning ensures our employees understand the basic principles of the Modern Slavery Act 2015 and how they can flag up potential slavery or human trafficking issues to the relevant parties within our organisation. We also provide relevant and up to date external help within our internal SharePoint Due Diligence

Due diligence is undertaken throughout our supply chain with our commitment to ensuring that our suppliers adhere to the highest standard of ethics. Through our online pre-qualification questionnaire and risk-based onboarding and evaluation process, we set out our expectations and requirements of our supply chain, whilst ensuring to evaluate and monitor the steps they take to prevent the exploitation of workers and how they adopt the Ethical Trading Initiative Base Code within their wider supply chain. We will where necessary terminate business relationships with those that fail to adhere to the highest standard of ethics. We further enhance this through regular reviews, and this is supported by our SHEQ department who conduct an annual audit program to ensure our supply chain adhere to the modern slavery and human trafficking requirements and to assess the risk profile of each supplier.

## Actions to be taken during 2024.


The organisation will:

- Continue to extend the use of the online supplier pre-qualification questionnaire across the organisation.

## Anti-Slavery and Human Trafficking Statement

- Complete an annual audit programme that ensures our supply chain comply with modern slavery and human trafficking requirements.
- Ensure all employees across the business successfully complete any new Modern Slavery e-learning module,
- Update the current Equal opportunities and dignity at work policy; this will be separated into two separate policies, one for Equal opportunities and one for Bullying and Harassment
- Continue to review and replace the Selwood Staff Policy and Siltbuster Staff Handbook with appropriate new stand-alone Workdry wide policies, in accordance with the HR Policies roadmap 2024-2025.

This Statement and Policy has been reviewed and approved by the Workdry Board of Executive Directors.

Director's Signature: 

Director's Name: Dan Lee, CEO

Date: 5<sup>th</sup> June 2024

*This document becomes uncontrolled on printing. Please ensure you are using the most current version by checking on SharePoint.*