



# MODERN SLAVERY

## Policy Statement



## **1. MODERN SLAVERY ACT 2015 STATEMENT**

This statement sets out the steps that EPS have taken to mitigate the risk of slavery and human trafficking occurring within any part of our business or our supply chain during the financial year ending 31st March 2018.

## **2. OVERARCHING STATEMENT**

Slavery and human trafficking are abuses of a person's freedoms and rights. We are totally opposed to such abuses in our direct operations, our indirect operations and our supply chain as a whole.

## **3. MEANING OF SLAVERY AND HUMAN TRAFFICKING**

Our understanding of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 and is guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation (ILO) particularly relating to forced or compulsory labour.

We recognise that forced labour as a form of slavery includes debt bondage and the restriction of a person's freedom of movement whether that be physical, non-physical or, for example, by the withholding of a worker's identity papers.

## **4. OUR BUSINESS**

E.P.S. Pumping & Treatment Systems is a well-established company in the Water and Wastewater Pumping and Treatment industry having been in existence since 1968 in Ireland. The EPS Group is a highly experienced and proven provider of water and wastewater treatment and pumping solutions. Our solutions range from the complex municipal and industrial projects to the single domestic units. Our clients range from homeowners to large multinational and municipal authorities.



We operate in Ireland, the UK and mainland Europe and currently export to a number of countries worldwide. We provide a service to the municipal, industrial, commercial, agricultural and domestic sectors.

Our flexible customer focus and innovative approach, coupled with our commitment to health and safety, quality and the environment, make us a trusted and reliable partner for all your water treatment and pumping related needs. EPS specialises in the design, build and operate (DBO) of infrastructure projects and we strive to deliver all projects on time, on budget and to a standard that our customers demand and expect.

## **5. OUR SUPPLY CHAINS**

We purchase the majority of our raw materials and components from third-party suppliers, mainly through leading international companies. Our products are sourced from various countries including Italy, Luxembourg, Germany and Taiwan.

For the purposes of this statement, we report on steps taken within our supply chain, by which we mean those suppliers to the Group with whom our organisation deals directly. We also report on those steps taken within such supply chains that have indirect effects on the wider supply chain.

## **6. RELEVANT POLICIES**

In keeping with our commitment to act with integrity in all our business dealings, many of our existing policies are relevant to ensure that there is no slavery or human trafficking in any part of our business or our supply chains.

Our relevant policies include:

- › Employee Handbook;
- › Sustainable Procurement Policy;
- › Business Ethics;
- › Corporate Social Responsibility

- › Equal Opportunity
- › Procurement
- › Sustainability
- › Sustainable Procurement

In our Employee Handbook relevant sections cover Equal Opportunities Policy Dignity and Respect Preventing & Dealing with Harassment & Bullying Complaints Procedure – Harassment & Bullying.

Our Employee Handbook sets out the behaviours we expect from employees in their dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisers, governments and competitors. All employees and suppliers are expected to act with integrity in accordance with the standards of behaviour set out in the handbook.

We provide guidance and training to support employee understanding of expected behaviour, particularly in respect of their business decisions and the above policies. We encourage employees to raise any concerns that may have regarding the above policies.

We believe in the business benefits brought about by diversity and equal opportunity. We therefore support collective bargaining for our own employees and through our supplier standards.

We actively support employee engagement, representation, dialogue and the ability of an employee to raise potential concerns or grievances. Freedom of association and the right to collective bargaining is a core labour standard that we respect as guided by the International Labour Organization (ILO). We apply our employment practices in line with, and in certain aspects exceeding the requirements of, local legislation.

## **7. RISK ASSESSMENT AND DUE DILIGENCE**

The risk of slavery and human trafficking within our own organisation is avoided and mitigated as a result of strict policies and procedures as well as the oversight built into our business operations and the knowledge and skills of our staff. We assess risk based on the US Department of Labour TVPRA List of Goods Produced by Child or Forced Labour. We screen



suppliers to identify and evaluate human trafficking and slavery risks. This includes geographic location, manufacturing processes, history of human trafficking and slavery in the region, and the U.S. Dept. of Labour's list of goods produced by Child or Forced Labour.

EPS formally review all contractors and suppliers before appointment and this review includes a questionnaire section on Corporate and Social responsibility which includes questions designed to establish the procedures and controls in place to prevent Modern Slave in our suppliers and contractors.

## **8. TRAINING AND AWARENESS**

All employees are given training in Human Rights awareness and EPS' commitment to ethical behaviour in all company activities.

## **9. EFFECTIVENESS AND PERFORMANCE REVIEW**

We do not have key performance indicators specifically in relation to slavery or human trafficking as any instance would be expected to be a non-compliance and breach of employment laws, our direct employment practices, wider Group policies and / or supplier standards.

Signed:  \_\_\_\_\_ March 2019  
Patrick Buckley  
Managing Director

Revision 1