

Anti-Slavery and Human Trafficking Policy

10 June 2025

PIPECOUK LTD

1. Policy Statement

PIPECOUK Ltd has a zero-tolerance approach to modern slavery and human trafficking in all its forms. We are committed to ensuring that our operations and supply chains are free from exploitation and that we uphold the principles of ethical trade and human rights.

While PIPECOUK Ltd does not currently engage in direct manufacturing or employ large-scale labour forces, we recognise our responsibility as a forward-thinking company to take a stand and apply rigorous standards — not just within our own operations, but across every link in our supply chain.

2. Scope

This policy applies to:

- All employees, contractors, directors, and freelancers working with PIPECOUK Ltd.
- All suppliers, manufacturers, logistics partners, and service providers who work on our behalf.
- Any other individuals or organisations that act on behalf of PIPECOUK Ltd, whether in the UK or abroad.

3. Our Commitment

PIPECOUK Ltd will:

- Comply with the **Modern Slavery Act 2015** and all relevant UK and international legislation.
- Conduct due diligence on suppliers, especially those operating in higher-risk regions or industries.
- Include anti-slavery clauses in supplier and distributor contracts where appropriate.
- Never knowingly do business with any organisation involved in slavery or human trafficking.
- Act immediately if any evidence of non-compliance is discovered.



Anti-Slavery and Human Trafficking Policy

10 June 2025

4. Supply Chain & Procurement Standards

We require that all our suppliers:

- Comply with the Modern Slavery Act (if operating in the UK) or equivalent international laws.
- Have appropriate anti-slavery and human trafficking policies in place.
- Proactively monitor and audit their own supply chains.
- Provide transparency on request regarding recruitment practices, wages, working hours, and subcontractors.

If suppliers fail to demonstrate these standards, PIPECOUK Ltd will review the relationship and may terminate agreements where necessary.

5. Recruitment and Employment Practices

PIPECOUK Ltd ensures that:

- All staff and contractors work voluntarily and are legally entitled to work in the UK.
- All pay meets or exceeds National Minimum Wage or equivalent fair standards.
- No employee is forced to work through threat, coercion, or debt bondage.
- Identity documents are never withheld or misused.

6. Training and Awareness

- All senior staff and those involved in procurement, partnerships, or supplier selection will be briefed on modern slavery risks.
- We will raise awareness within the business to spot red flags and escalate concerns appropriately.
- Training resources and policy access will be included in onboarding for relevant roles.



Anti-Slavery and Human Trafficking Policy

10 June 2025

7. Reporting and Whistleblowing

PIPECOUK Ltd encourages transparency and open reporting. Any employee, supplier, or stakeholder can raise concerns about suspected modern slavery through our confidential reporting process.

Concerns should be directed in the first instance to the Managing Director or via secure digital channels provided for whistleblowing.

Reports will be treated seriously, confidentially, and without retaliation.

8. Monitoring and Review

- This policy is reviewed annually by the Managing Director or following any significant changes to the law or our operations.
- Monitoring is part of our regular supplier review process.
- PIPECOUK Ltd remains committed to continual improvement and transparency.

9. Sign-Off

Signed:

Jamie Larkin Managing Director PIPECOUK Ltd