

SIMONA

PEAK

P I P E S Y S T E M S

Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out Simona Peak Pipe Systems' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st January 2024 to 31st December 2024.

As part of the manufacturing sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously.

Our organisation is absolutely 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.

Organisational structure and supply chains

This statement covers the activities of Simona Peak Pipe Systems:

Simona Peak Pipe Systems manufactures multi-utility polyethylene pipe systems for the UK utility, renewable energy, aquaculture and infrastructure markets. We supply to our comprehensive network of partner merchants and distributors who offer excellent UK coverage, stock holding and reactive short lead-time product availability.

With 50 years market experience as a key part of the Fusion Group of Companies, Peak Pipe Systems Limited was formed in June 2012, which as of the 28th February 2022 became Simona Peak Pipe Systems Limited. A direct focus on manufacturing high-quality polyethylene pipes, fabrications and other fittings from 20mm up to 630mm. Offering products to the gas, water, drainage, power, renewable energy and aquaculture sectors

Countries of operation and supply:

We currently operate in the United Kingdom and supply to the United Kingdom and Ireland.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- When recruiting for workers and employees, our company ensures all the right to work checks are made in compliance with Right to Work UK.

When recruiting our company promises to use the below processes to reduce the risks of modern slavery and human trafficking:

- Not allow job applicants to complete registration documents on behalf of others;
- Not use a supplier for labour outside of the business approved suppliers without first obtaining authorisation from a manager and approval from the client in writing;
- Not accept money, favours or any gifts at all from job applicants or workers;
- Not loan any personal money to temporary workers;
- Notify the Managing Director when informed by a job applicant or worker that they have paid money to be introduced to the Company;
- Notify the Managing Director when suspecting an individual of introducing job applicants to the Company for personal gain;
- Not allow anyone other than a person authorised by management to choose which workers are selected in the recruitment process;
- Not force or coerce temporary workers to work against their will;
- Not threaten or subject workers to physical or mental mistreatment;
- Treat applicants and workers with dignity and respect;
- Raise any knowledge or suspicions of illegal or dubious activities regarding agents, temporary workers or colleagues to a manager immediately

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The company's HR department reviews company policies to ensure that they are legally compliant and monitors any changes/upcoming changes. In particular in relation to Modern Slavery and Human Trafficking, recruitment policies and whistleblowing.
- **Risk assessments:** The company is a responsible employer and ensures that when recruiting right to work UK checks are always completed. The company also regularly reviews its pay to ensure at least the relevant NMW/NLW is paid to all of our employees.
- **Investigations/due diligence:** Alongside checks that the HR department makes during the recruitment process in respect of right to work UK, the company also engages a 3rd party company to undertake regular auditing of onboarding processes and documentation to ensure this.
- **Training:** The company has rolled out Modern Slavery Training of which includes a copy of this statement to all of its workers/employees to better understand and respond to the identified slavery and human trafficking risks.

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 workers, 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 workers to make disclosures, without

fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline/complete our confidential disclosure form.

- **Company Rules** Our policy makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.
- **Any other policies relevant to our business or sector** Our company has a corporate social responsibility, recruitment, bullying and harassment, equal opportunities and diversity and inclusion policies.

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier by requesting they complete a New Supplier Assessment form which includes asking for policies relating to Modern Slavery and Human Trafficking and Ethical Trading to assess the supplier
- monitoring/reviewing; for example supplier websites where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular.

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are:

- requiring all staff to have completed training on modern slavery by 22nd November 2024;
- conducting supply chain verification on all potential new suppliers; whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains and auditing every six months for all suppliers that fall under 'A Suppliers' and all 'B Suppliers' annually;
- having a dedicated avenue through our whistleblowing policy to report any modern slavery incidents/grievances, in 2024 there were no reported incidents/grievances raised for Simona Peak Pipe Systems Limited;
- number of policies that address modern slavery are our recruitment procedure as this includes ensuring we complete right to work checks for each new employee before commencing employment alongside auditing our rates of pay to ensure our employees receive at least national minimum wage.

Training

We require all staff within our organisation to complete training on modern slavery as a module within our wider human rights/ethics/ethical trade training programme.

We require all staff to complete the training assigned to them to be completed by 1st December 2024. We expect all our staff to treat all other members of the company, clients, customers with respect and dignity at all times as per our company rules.

Our modern slavery training covers:

- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by putting up posters across our premises.

The posters explain to staff:

- How to identify acts of Modern Slavery and Human Trafficking
- Statistics of Modern Slavery and Human Trafficking

Board approval

This statement was approved on 19th May 2025 by our board of directors, who will review and update it annually.

Managing Director's Signature:

A handwritten signature in black ink, appearing to be 'A. Jones', written in a cursive style.

Director's signature:

A handwritten signature in black ink, appearing to be 'M. Smith', written in a cursive style.