



Anti-Slavery and Human Trafficking Policy

Policy Statement

Performance Fluids is committed to providing a work environment that is free from human trafficking and slavery by promoting ethical employment practices and will not knowingly work with companies that employ or utilise forced labour.

We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within the organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for the organisation or on our behalf in any capacity.

Commitments

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, forced and compulsory labour, servitude, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view that the person will be exploited. Modern slavery is a crime and violation of fundamental human rights.

Performance Fluids is a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and supply chains.
- The prevention, detection and reporting of modern slavery in any part of the organisation or supply chain is the responsibility of any person working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

- We are also committed to ensuring there is transparency in our own organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.
- We take a risk-based approach to our contracting processes and keep them under review. We will assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using the risk-based approach we will assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which will set out the minimum standards required to combat modern slavery and human trafficking.
- Consistent with our risk-based approach, we may require:
 - Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
 - Suppliers engaging workers through a third party to obtain that third party's agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with Code of Conduct
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

Training and Awareness

We know how vital it is that our employees understand the issue of Modern Slavery and can recognise the signs and report potential instances in our supply chain. Therefore, we may arrange training sessions on modern slavery, particularly for those employees who engage with suppliers, to help them understand the risks of Modern Slavery and Human Trafficking, specific to their supply chains, and how to spot potential dangers through both the initial supplier onboarding process and subsequent suppliers reviews and assessments.

Warning Signs

It is important that anyone working for us understands what modern slavery and human trafficking is, understands the warning signs and know where to report suspicions of modern slavery.

We have listed below some warning signs to look out for, though not exhaustive:

- Physical appearance – signs of abuse, looking malnourished or appear withdrawn;
- Isolation – Rarely working alone, seemingly under the control or influence of another and rarely interacting with others;
- Poor living conditions and suspicions of them living at the same address that they work at;
- Few personal possessions and wearing the same clothing again and again, sometimes clothing unfit for the work they are undertaking;
- Unusual and long working hours with little or no break
- Avoiding eye contact, appearing frightened etc.

Reporting Process

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must report it to (Insert designated Manager responsible).

Every instance will be taken seriously and fully investigated. You will not be victimised for the reporting of a situation. If you are anxious or afraid, for your own personal protection and safety, you can ask to remain anonymous. Please be assured that you will be fully supported through the reporting and investigation of any genuine breach of our modern slavery policy.

Breaches

Any of our employees in breach of this policy, without a satisfactory reason, will be liable to serious disciplinary action being you up to and including summary dismissal.

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action.

Print: David Horsfield, Managing Director

Signature:  _____

Date: 14/05/2024