

Modern Slavery Act 2015  
**EPS PIPEWORKS LTD**  
**Slavery and human trafficking statement 2016/17**

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# **EPS PIPEWORKS LTD POLICY**

1. EPS PIPEWORKS LTD provides specialised pipework services to the Refrigeration, Oil and Gas Industries.
2. EPS is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the management of its activities and we comply fully with the European Working Time Directive.
3. EPS adopts zero tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.
4. We fully support the government's objectives to eradicate modern slavery and human trafficking.
5. Our annual statement will provide information to supplement this policy, including details of our activities and supply chains and actions we are taking to support government.
6. We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

LEE MURPHY  
DIRECTOR  
02/01/2018

## **Statement introduction**

1. EPS PIPEWORKS LTD provides specialised pipework services to the Refrigeration, Oil and Gas Industries.
2. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 March 2017.
3. This is our second annual statement and it contains a summary of progress undertaken within Year 2 of our current work plan.
4. Our activities are usually undertaken solely in England.

## **Steps taken by EPS since April 2016 – Year 2 of our work plan**

### **Management responsibility and general awareness**

5. Responsibility for the preparation and publication of this policy resides with our Directors

We have:

- Reported progress to our Executive Management Team and our Board.
- Reconfirmed management responsibility for this policy and statement and received unanimous endorsement from our Executive Management Team and our Board.
- Raised awareness of this published statement and the Modern Slavery Act by notifying organisations in our Frameworks, Delivery Partnerships and other companies with which we regularly engage.
- Prepared the second annual statement.

## **Risk assessment**

We have:

- Completed a review of this policy and statement against our activities to establish whether the approach we have taken follows emerging best practice by:
- Assessing and interpreting any recent best practice
- Reconfirmed that our primary risk is an association with a Delivery Partner, Framework participant or company with an ambiguous or non-compliant supply chain.

## **Additional risk mitigation**

We have:

- Introduced new processes and procedures in relation to procurement and due diligence, as outlined later in this statement.
- Confirmed the applicability and enforceability of clauses and conditions included in our legal agreements and contracts.

# **Supply chain and business due diligence**

## **Scope of our procurement activities**

6. Our procurement activities take place in England; and our contractors and suppliers are predominantly UK and EU based.

7. We recognise smaller suppliers may not have a Policy. We reserve the right to cease trading with any supplier who we feel is failing to comply with the spirit of the act.

8. We place general reliance upon our ISO accredited suppliers and our supplier questionnaires to provide us with their assurance and policy statements.

9. We only maintain a goods, materials or direct-labour supply chain Framework.

10. In common with many organisations, our employees occasionally stay in UK hotels when conducting business away from the office. We note that the hotel and hospitality trade recognise the risk of modern slavery within their sector and a Stop Slavery Hotel Industry Network is being developed by the industry.

## **Procurement and tender process improvements**

11. Our terms and conditions includes the mandatory exclusion of any supplier who has been convicted of an offence under the Modern Slavery Act 2015.

## **Steps to take – Year 3 – 2017/18**

### **Management responsibility and general awareness**

We will:

- Report progress to our Executive Management Team and our Board.
- Continue to raise awareness of this published statement by re-notifying organisations in our Frameworks, Delivery Partnerships and other companies with which we regularly engage.
- Remind employees of our obligations under the Act.
- Prepare the third annual statement for publication in 2018.

### **Further risk assessment**

We will:

- Undertake a within-year review of this policy against our activities to establish whether the approach we have taken remains proportionate and appropriate by:
- Assessing and interpreting any best practice; and
- Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
- Working with our Framework and delivery partners to ensure escalation and notification of suspicious activity.

### **Ongoing risk mitigation**

We will:

- Act promptly where a compliance breach has been identified or flagged.
- Continue to feed-back lessons learnt into the compliance risk management process.

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