

Modern Slavery Policy

Who are we?

The LFF Group is a corporate group consisting of London Fittings & Flanges, LFF Scotland, LFF Glamal, LFF Kisco, Valvenco, LFF New Zealand, LFF Australia, LFF South-East Asia, LFF Houston, LFF Pipelines and Infrastructure, LFF Middle East Dubai and LFF Middle East Qatar.

The LFF Group is an international leading supplier in the procurement, stockholding and distribution of piping components, valves and associated products in a wide range of material grades encompassing carbon steels through to super duplex and nickel alloys to industries including oil, gas, power, petrochemical, pharmaceutical, food & beverage, water & gas utilities, marine and nuclear.

Modern Slavery and Human Trafficking

The sphere of influence of the LFF Group in the field of human rights beyond our staff and contractors is limited. We are, nevertheless, committed to ensuring that there is no modern slavery or human trafficking in our supply chains, nor any part of our business. This policy reflects our commitment to act ethically and with integrity in all our business relationships, and to implement and enforce proportionate systems and controls which address the risks of modern slavery and human trafficking.

As part of our efforts to identify and mitigate the risks of modern slavery and human trafficking, we shall:

- Conduct thorough checks during our hiring process to ensure none of our employees are forced or compelled to work for us,
- We will ensure our business activities do not facilitate modern slavery,
- Seek to build long term relationships with our suppliers and highlight to them our expectations of business behaviour,
- Seek to ensure that these entities have suitable anti-slavery and human trafficking policies and procedures in place,
- Promote best practice within our procurement processes with the aim of eliminating the risk of modern slavery & human trafficking occurring in our supply chains,
- Not use child labour,
- Not knowingly support or deal with any business involved in slavery or human trafficking.

Implementation

Senior Management take responsibility for implementing this policy and its objectives and shall provide training and adequate communication throughout the LFF Group to ensure that slavery and human trafficking is not taking place within the LFF Group or its supply chains.

LFF Group carries out verification checks (e.g., passport verification) on new employees as part of its onboarding process to ensure slavery and human trafficking is not introduced into the organisation.

We carry out staff training in this area, reinforcing awareness of existing policies throughout the organisation and ensuring all employees know how to report any grievances.

We conduct due diligence with our suppliers to ensure that no slavery or human trafficking is conducted within their organisation and that appropriate steps have been taken to ensure there is no slavery or human trafficking in their supply chains.

A term of our contracts with suppliers' states *"Each party to this contract confirms that there is no Modern Slavery or human trafficking in its own organisation and that it has taken appropriate steps to ensure that there is no Modern Slavery or human trafficking in its supply chains."*

Review

We review our policy at least annually, and we will place any updates on the LFF Group webpage.

Signed by:



Tristan Wahl

LFF Group Director

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