

Modern Slavery Policy

Who are we?

The LFF Group is a corporate group consisting of LFF, LFF Scotland, LFF Glamal, LFF Glamal Europe, LFF Kisco, LFF Australia, LFF New Zealand, LFF Pipelines and Infrastructure, LFF South-East Asia, LFF Valvenco, LFF Middle East Dubai, LFF Middle East Qatar, LFF Houston, LFF Spromak Engineering and Dyform Jenkins Dunn.

The LFF Group is a major stockholder and global supplier of pipe, fittings, flanges, valves, and forged products across all material grades, serving industries including energy, oil, gas, chemical, food, and water. Through our UK manufacturing subsidiaries, we produce high quality reinforced branch connection fittings and an extensive range of engineered products.

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. We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

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."*

Response to reports of suspected breaches of the Modern Slavery Act

Modern slavery is a criminal offence. Should reports of suspected breaches of the Modern Slavery Act be made, the LFF Group Senior Management will conduct a fact-finding investigation and take appropriate action. If a breach of the Modern Slavery Act is found, all relevant evidence will be handed over to the police for further investigation

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

Visit us at: <https://www.lffgroup.com>

E-Mail us at: CSR@LFFGroup.com

Write to us at: LFF Group, Pegasus House, Wynyard Ave, Wynyard, Teesside, TS22 5TB, United Kingdom