

Harris Pye Engineering Group Limited (“Harris Pye” or the “Group”) Modern Slavery Statement 2021

Harris Pye is committed to understanding 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, human trafficking, child labor and forced labor (together “Modern Slavery”) in its own business and its supply chains.

As part of the global engineering sector the organization recognizes that it has a responsibility to take a robust approach to Modern Slavery.

The organization 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.

Organizational Structure and Supply Chain

This statement covers the activities of the Harris Pye Engineering Group Ltd:

Harris Pye is a global specialist in the repair, maintenance, upgrade and installation services for boilers, heat transfer and associated equipment within the marine, offshore, energy from waste, and associated onshore industrial sectors.

The organization currently operates in various countries worldwide.

Managing Risk

Harris Pye has zero tolerance to Modern Slavery. We expect all our businesses and those in our supply chain and contractors to comply with our values.

The organization operates the following policies that describe its approach to the identification of Modern Slavery risks and steps to be taken to prevent Modern Slavery in its operations:

Employee code of conduct: The organization’s code of conduct makes clear to employees the actions and behavior expected of them when representing the organization. The organization strives to maintain the highest standards of employee conduct and ethical behavior when operating globally and managing its supply chain.

Whistleblowing policy: The organization encourages all its employees and contractors to report any concerns related to the direct activities, or the supply chains of, the organization. This includes any circumstances that may give rise to an enhanced risk of Modern Slavery. The organization’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation through confidential communication channels.

Identification of suppliers: Harris Pye carries out due diligence on new and existing suppliers to ensure these meet the organizations expectations and adherence to the

Group's policies and standards. We recognize that particular suppliers perceive a higher risk due to the origin of goods and labor and adopt a risk-based proportionate approach to assess these suppliers.

Learning

Embedding the principles

We will continue to embed the principles through:

- Providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of Modern Slavery;
- Ensuring that consideration of the modern slavery risks and prevention are added to Harris Pye's policy review process as an employer and procurer of goods and services;
- Making sure Harris Pye's procurement strategies and contract terms and conditions include references to Modern Slavery;
- Continuing to take action to embed a zero-tolerance towards Modern Slavery; and
- Ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on Modern Slavery and ethical employment practices.

Our Commitment

The Managing Director of the organization will continue to lead this agenda and will report next year on any further steps taken in the current year to maintain robust procedures on Modern Slavery.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the organizations Modern Slavery Statement for the year ended 31 December 2021.

This statement was approved by the Board of Directors of Harris Pye Engineering Group Limited and signed on its behalf by:



Dean Watson
Director, Harris Pye Engineering Group Limited

15 August 2021