



Severn Group

Modern Slavery & Human Trafficking Statement

JANUARY 2023

We prize the sense of belonging and family spirit across our operations. Everyone at Severn Group contributes to our success – we are incentivised and empowered to positively impact business achievements, environmental sustainability and high performance in safety.

The Approach

This Statement is made by Severn Group pursuant to section 54(1) of the Modern Slavery Act 2015, (the "Act").

This Statement sets out the steps we have taken to ensure that our business and supply chains are free from modern slavery and human trafficking during the financial year ending 31st December 2022.

Organisation

The Severn Group have over 60 years' experience in superior valve engineering, supplying high integrity products and services to overcome complex and extreme production demands in the energy industries.

With sophisticated manufacturing operations in the UK, India, and the US, Severn Group has technical service and support operations throughout the world, with almost 1000 employees and a global supply chain. Our customers and stakeholders rely on us to maintain the highest standards in what we do, and how we do it. We source finished products and raw materials from locations across the globe, it is key for all our people and our supply chains to be aware of the risks of modern slavery and human trafficking and identify those risks.

Commitment to the prohibition of modern slavery

In line with our values, Severn Group is committed to preventing slavery and human trafficking occurring in any of its corporate activities around the world as well as seeking to ensure our supply chains are also free from such practices.

Severn Group shares best practice amongst its global operations with all group companies making a commitment to a mutual Code of Conduct approved by the Chief Executive Officer. The Code of Conduct sets out the ethical values by which Severn Group directs the behaviours of all our employees and is communicated to our people, business partners and suppliers.

Our commitment to tackling modern slavery is communicated to our supply chains, embedded in our procurement policy and is part of the way we work.

Accordingly, Severn Group does not knowingly use unlawful child labour or forced labour in any of the utilities, other commodities, products or services it provides, nor will we accept commodities, products or services from suppliers that employ or utilise child labour or forced labour.

Looking back over the year

Last year's aim	Our progress
Ethics and compliance training for all our people and agents to include modern slavery and human trafficking principles.	We have launched a Learning Management System and provided all our people with Code of Conduct training. This training includes interactive modern slavery and human trafficking modules. Completion of these modules is mandatory for all people.
We will implement key performance indicators (KPI's) to monitor the effectiveness of compliance with modern slavery and human traffic legislation throughout our supply chain, ensuring our service providers demonstrate practical commitment and are engaged in active compliance.	We implemented a KPI that our sales agents must have a documented ethics and compliance audit completed and filed centrally. All of our agents have this on file.
Inclusion and revision of General terms and Conditions for all new procurement contracts to include specific modern slavery and human traffic prevention provisions.	We have been updating our terms and conditions across both our procurement contracts and our sales contracts to achieve standardised terms. This includes specific modern slavery and human traffic prevention provisions. Therefore, we may be unable to use our own standard terms and conditions. In these situations, we always demand specific modern slavery and human traffic prevention provisions in external contracts and will not work with companies that do not provide this.
Revision of all ethics and compliance policies and the development of a process control framework which will incorporate specific guidance on modern slavery and human trafficking.	We have updated and produced the following policies: Anti-Bribery and Corruption Policy, Code of Conduct, Corporate Gifts and Hospitality Policy, Corporate Governance Statement, Equality, Diversity and Inclusion Policy, and Environment, Social and Governance Policy.

Future Activities:

- To form an ESG sub-group looking specifically at Governance
- Continue to train all of our people on key topics
- To conduct a modern slavery and human trafficking risk assessment
- To expand our supplier due diligence process by ensuring that questions are issued to all suppliers, and consider additional questions for those suppliers who operate in the higher-risk areas

Signed By: 
 Perttu Louhiluoto

On behalf of the Board of Contour Technologies Limited

Reporting concerns

Any concerns about modern slavery or human trafficking taking place in any part of the Company or supply chain can be raised directly with our People Team or anonymously via our Whistleblowing Hotline. For further information please refer to our Speak Up and Whistle Blowing Policy found on the Group SharePoint site.



At Severn Group, our business success flows from expertise – from technical knowledge and experience that position us as a leader in our field. Not everything, however, can be engineered. The Values which underpin that success stem instinctively from the culture we seek to sustain. Everything we do is tested against our Values, and our people are encouraged to apply them every day: they are the stewards of our brand, our reputation, our heritage, our ambitions.



Customer



Integrity



Excellence



Accountability



SEVERN
Superior Valve Engineering