

Critical Flow Systems Ltd.

**BUSINESS
POLICIES**

**Unit 15,
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**May 2024
Issue 6.7**

Contents

REVIEW PROCEDURE 3

1 QUALITY, ENVIRONMENTAL & OH&S POLICY 4

2. SUBSTANCE ABUSE POLICY 5

3 ANTI-BRIBERY POLICY 7

4 PREVENTION OF VIOLENCE, HARASSMENT AND BULLYING POLICY 8

5 EQUAL OPPORTUNITIES POLICY..... 9

6 DATA PROTECTION POLICY..... 11

7 COVID-19 (CORONAVIRUS) POLICY 12

8 WHISTLEBLOWING POLICY 13

9 MODERN SLAVERY ACT 2015 15

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	2

REVIEW PROCEDURE

This policy will be kept up to date to reflect changes in the nature of the business and size of the company. This policy is formally reviewed annually by the Company in conjunction with its external safety advisors, and any changes ratified as necessary.

POLICY REVIEW

<u>Date</u>	<u>Name</u>	<u>Issue No.</u>	<u>Changes</u>
03/09/14	C. Corris	1.1	New Document for review
30/09/14	C. Corris	2.0	Policy Issued
30/01/15	C. Corris	3.0	General Update of policies
13/04/15	C. Corris	3.1	Updated Policy issued
02/02/16	SHREC Ltd	4.0	Full policy review
27/03/2017	PGB	5.0	Anti-Slavery Policy Added
09/08/17	PGB +TB	5.1	Anti-Slavery Policy converted and added to arrangements
18/08/17	PGB + TB	5.2	Updated equal opportunities policy
22/05/2018	PGB TB	5.3	DATA Protection Policy (GDPR) Added
07/6/19	CJC, PGB, TB	5.4	Referenced to Health and Safety at Work etc Act 1974
15/11/19	TB	5.5	Added signatures to each Policy.
06/01/2020	PGB	5.6	Policy name changed to Business Policies. GDPR changed to Data Protection Act 2018. Integrated Q&E Policy added.
01/05/2020	PGB/TB	5.7	Added COVID-19 & Whistle blowing Policy
16/10/2020	TB	6.0	Added Combined H&S, Quality and environmental Policy (ISO 9001; 14001 & 45001) Removed old policies. Removed old BS manual pages. Combined Version number with issue number (iss6 v0 changed to Iss 6.0)
25/02/21	CJC, PGB & TB	6.1	Review of equal opportunities policy. Re-signed policies.
19/07/21	PGB & TB	6.2	Reviewed Covid-19 Policy. Changed references to self-isolation.
28/02/2022	TB, CJC & CLA	6.3	Review and reissue with signatures
15/03/2022	CLA	6.4	Section 8 - Formatting and inclusion of contact details for Mark Jackson and inclusion of independent Whistleblowing website to provide further information and clarity for employees
27/06/2022	CLA	6.5	All sections – general formatting, grammar and reviewing information accuracy. Only sections mentioned above have been modified in terms of content. Section 2 – Substance Abuse Policy – inclusion of links to NHS for support and advice Section 5 – paragraph numbering corrected and inclusion of link to Legislation.gov.uk for further information on The Equality Act 2010 Section 6 – Data Protection – inclusion of link to www.gov.uk Section 7 – Covid -19 Policy – included review frequency and HSE and www.gov.uk links
04/07/2023	CLA	6.6	All sections – changed signature line to be consistent across all policies. Section 3 – Antibribery – included refer to Gov.uk Antibribery Act 2010 Section 4 – Violence in the Work Place: included reference to harassment victimisation and bullying. Section 7 – Covid policy – removed policy content and replaced with Gov.uk and HSE websites which should be followed in the event of a further pandemic.
10/05/2024	CLA	6.7	Included Modern Slavery Policy (removed from Health & Safety Arrangements)

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	3

1 QUALITY, ENVIRONMENTAL & OH&S POLICY

It is the policy of CFS Ltd. To maintain a quality system designed to meet the requirements of ISO 9001:2015, ISO 14001:2015; ISO 45001:2018 in pursuit of its primary objectives, the purpose and the context of the organisation.

It is the policy of **CFS Ltd.** To:

- strive to satisfy the requirements of all our customers, stakeholders and interested parties whenever possible, meeting and exceeding their expectations.
- comply with all compliance obligations, codes of practice and all other requirements applicable to our activities including the nature, scale and environmental impacts of its activities, products and services.
- the reduction of hazards, prevention of injury, ill health, protection of the environment, including prevention of pollution, sustainable resource use, climate change mitigation and adaptation, the protection of biodiversity and ecosystems and any other specific commitments which are relevant to the context of the organisation.
- ensure commitment to provide safe and healthy working conditions for the prevention of work related injury and ill health which satisfies the requirements of all of our customers, stakeholders and interested parties whenever possible and is specific to our OH&S risks and OH&S opportunities.
- reduce hazards, OH&S risks, prevention of injury and ill health.
- provide all the resources of equipment, trained and competent staff and any other requirements to enable these objectives to be met.
- ensure that all employees are made aware of their individual obligations in respect of this policy and ensure that consultation and participation of workers, to be actively involved in the management of the system and the activities supplied.
- maintain a management system that will achieve these objectives and seek continual improvement in the effectiveness and performance of our management system based on "risk".

This quality, environmental and OH&S policy provides a framework for: setting, monitoring, reviewing, achieving our objectives, programmes, targets.

Customer service is an essential part of our Objectives and to ensure this is fulfilled, all employees receive training to ensure awareness and understanding of quality, H&S and environment issues and its impact on customer service and of the products or service in which we provide.

To ensure the company maintains its awareness for continuous improvement, the quality, environmental and OH&S system is regularly reviewed by the "Director" to ensure it remains appropriate and suitable to our business. The Management system is subject to both internal and external annual audits.

Chris Corris
Directors Signature

Date: 4 July 2023



Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	4

2. SUBSTANCE ABUSE POLICY

2.1.1 General

The company wishes to pursue a Policy to promote health and safety at work and acknowledge that it has a legal responsibility to safeguard the health, safety and welfare of all its employees and other persons who may be affected by alcohol and drug abuse.

The Directors and Line Managers will be responsible for identifying and controlling risks at their level of responsibility. The Directors will have overall responsibility for the effective implementation of the Policy.

The Company reserves the right to initiate drug and alcohol screening/testing on all or part of the work force routinely, occasionally or on a random basis.

2.1.2 Confidentiality

If employees feel they may have a drink or drug problem, they are advised to seek help at an early stage. A director can be contacted at any time and any discussions will be treated in the strictest confidence, subject to the provisions of the law.

2.1.3 Assistance

Drinking and drug problems will be treated as a health problem rather than an immediate cause for dismissal or disciplinary action if assistance/advice is sought. Any employee who seeks assistance/advice in relation to a drinking or drug problem will not be discriminated against in any way.

2.1.4 Alcohol

The Company requires its employees to attend work in a fit and appropriate state with no impairment from the effects of alcohol. Being unfit for work due to alcohol consumption is prohibited and grounds for summary termination of employment.

The Company reserves the right to initiate disciplinary action and arrange for alcohol testing on employees in the following specific circumstances:

- a) After an accident or incident, where there is suspicion of drinking that contravenes the Company's regulations.
- b) Employee suspected of reporting for work with alcohol in their bloodstream from the previous evening's drinking
- c) Witness evidence of erratic behaviour that it is suspected may put the health and safety of any employee at increased risk.

2.1.5 Drug Misuse

This Policy of 'drug misuse' refers to the use of illegal drugs and the misuse, whether deliberate or unintentional, of prescribed drugs and substances such as solvents. Drug misuse can harm the misuser both physically and mentally and, through the misuser's actions, other people and the environment.

Drugs can affect the brain and the body in a number of ways. They can alter the way a person thinks, perceives and feels, and this can lead to either impaired judgement or concentration. Drug misuse can also bring about the neglect of general health and wellbeing. This may adversely influence performance at work, even when the misuse takes place outside the workplace.

The Company requires its employees to attend for work in a fit and appropriate state with no impairment from the effects of drug misuse. Being unfit for work due to drug misuse is prohibited and grounds for summary termination of employment.

Drug misuse during working hours is strictly prohibited and will result in summary termination of employment.

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	5

The Company reserves the right to initiate disciplinary action and refer employees for drug testing in the following specific circumstances:

- a) If help is refused and/or impaired performance continues
- b) After an accident/incident, where there is suspicion of drug misuse.
- c) Witness evidence of erratic behaviour which it is suspected may put the health and safety of any employee at increased risk.

2.1.6 Support

If an employee would like to seek support and advice related to alcohol and drug addiction below are two links to the NHS that can be utilised:

<https://www.nhs.uk/live-well/alcohol-advice/>

<https://www.nhs.uk/live-well/addiction-support/>

N.B. Possession/dealing will be reported immediately to the Police.

Chris Corris
Directors Signature

Date: 4 July 2023



Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	6

3 ANTI-BRIBERY POLICY

3.1.1 Introduction

The Company values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy,
- Establishing and implementing anti-bribery procedures as appropriate,
- Communicating this policy and any relevant procedures to employees and to others who will perform services for the Company
- Undertaking appropriate due diligence measures before engaging others to represent the Company in its business dealings,
- Monitoring and reviewing the risks and the effectiveness of any anti-bribery procedures that are in place.

3.1.2 Policy

The Company prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement)

- to or from any person or Company (wherever they are situated and whether they are a public official or body or private person or Company),
- by any individual employee, agent or other person or body acting on behalf of the Company,
- in order to gain any commercial, contractual or regulatory advantage for the Company in a way that is unethical,
- or in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of the Company or of the person or body employing them or whom they represent. This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded. Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to a Director before proceeding.

3.1.3 Employees' responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees and the Company is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery,
- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately,
- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution, taking disciplinary action against any individual(s) involved in bribery.
- Any suspicion of bribery should be reported in confidence to the Director, who has overall responsibility for bribery prevention.

For further guidelines on Antibribery regulations please refer to <https://www.gov.uk/government/publications/bribery-act-2010-guidance>

Chris Corris
Directors Signature



Date: 4 July 2023

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	7

4 PREVENTION OF VIOLENCE, HARASSMENT AND BULLYING POLICY

4.1.1 Policy Statement

The company in recognition of its general duty under Section 2 of the Health and Safety at Work etc. Act 1974, and more specifically the current edition of the Management of Health and Safety at Work Regulations to provide safe systems and places of work including adequate information, instruction and supervision. Management accepts that any actual or implied threat of violence, harassment or bullying in any form to employees is wholly unacceptable and will make every effort to eliminate or reduce to an acceptable level the risks of violence.

This policy applies to all staff, irrespective of seniority, tenure and working hours, including all directors and officers, casual or agency staff, trainees, interns, fixed-term staff, volunteers, consultants and contractors. It also covers harassment and bullying by third parties, such as customers, suppliers or visitors to the business premises. Vice versa, this policy applies to any violence, harassment or bullying towards any of Critical Flow suppliers or customers by any Critical Flow employees.

Harassment is defined as unwanted conduct related to a relevant protected characteristic (within the Equality Act 2010) which has the effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Unlawful harassment may involve conduct of a sexual nature or it may be related to age, race, colour or nationality, ethnic or national origins, sex, gender reassignment, sexual orientation, disability, religion or belief, pregnancy or maternity.

Violence is defined as behaviour which produces damaging or hurtful effects, physically or emotionally, on people and can be defined as any incident in which an employee is abused, threatened or assaulted. Violence can take many forms including physical violence, verbal abuse and threats (with or without a weapon), rude gestures and innuendoes.

In order to meet its obligations to employees, the Management is committed to the following policy principles.

- a) The risks faced by employees in carrying out their responsibilities and the increasing number of threats in our society are acknowledged.
- b) Actual or threatened assaults on employees are wholly unacceptable and these guidelines are issued to provide assistance to employees in dealing with violent or aggressive behaviour as well as incidents of harassment or bullying.
- c) Management recognises and acknowledges certain duties may carry additional risks to employees in dealing with violent or aggressive behaviour as well as incidents of harassment or bullying.
- d) There is a commitment of the Management to supporting its employees who are subject to assault in the course of their employment. The extent of such support will depend on the individual circumstances of each incident and will be determined accordingly. Practical means of support may also be offered (e.g. time off -availability of counselling -positive staff welfare approach).
- e) Every incident reported will be investigated thoroughly by Management and a written report submitted. A central file of such incidents will be kept by Management and information relating to incidents collated. Copies will also be sent where applicable to the Insurance Company.
- f) Information regarding any incidents may be recorded in employee personnel files, along with a record of the outcome and of any notes or other documents compiled during the process. Such data will be processed in accordance with the Employer's Data Protection and Data Security Policy.
- g) The detailed guidelines outlined in other sections of this document will be reviewed regularly and as experience develops.

The Management is committed to full consultation with all concerned on all aspects of policies and procedures relating to violence, harassment or bullying.

Chris Corris
Directors Signature



Date: 4 July 2023

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	8

5 EQUAL OPPORTUNITIES POLICY

5.1.1 INTRODUCTION

Critical Flow Systems Ltd (CFS) is committed to a policy of equality of opportunity as an employer with regard to our policies and practices for employees and potential employees. This means that no employee or applicant will be treated less favourably on the grounds of their sex, marital status, race, nationality or ethnic origin, disability, sexual orientation, gender identity, age, religion, working practices or whether they have HIV and/or AIDS.

This policy covers all areas of employment: recruitment and selection, terms and conditions, promotion, transfer, training, appraisal and selection for redundancy. The policy outlines what equality of opportunity means Critical Flow Systems Ltd, what we mean by discrimination and harassment, what sort of behaviours and attitudes we wish to promote, and also what procedures and actions you can take if you feel you have been discriminated against, victimised or harassed.

The Equal Opportunities Policy will be communicated to all applicants, new appointees during their induction and to all employees. CFS is committed to the recruitment and retention of disabled people and has gained official recognition as CFS believes that equality of opportunity is vital so that all employees have a fair and equal chance of developing their abilities and realising their expectations and to make full and effective use of their potential. It CFS aim to create a working environment free from discrimination and harassment based on respect, and to enable employees to successfully balance home and work commitments.

Critical Flow Systems Ltd recognises that discrimination exists and, as an employer, is committed to ensuring that such behaviour and attitudes are eliminated.

Critical Flow Systems Ltd is committed to the principles of equality on the basis of fairness and valuing the contribution of all our employees. However, there are some areas where discrimination and harassment are covered by law, such as the Equality Act 2010 which harmonised antidiscrimination law with effect from 1 October 2010.

5.1.2 DISABILITY DISCRIMINATION

Under the Equality Act 2010 a person has a disability if they have a physical or mental impairment and the impairment has a substantial and long term adverse effect on their ability to carry out normal day to day activities. The list of specific "capacities" under the old legislation (Disability Discrimination Act) has gone making it easier for a claimant to establish disability in cases to which the closed list of capacities did not easily apply. CFS is committed to the recruitment and retention of disabled people.

The Equality Act imposes a duty on employers to make reasonable adjustments in cases where working arrangements or physical features of premises cause substantial disadvantage for a person with a disability. Critical Flow Systems Ltd will provide the necessary equipment and facilities for employees, applicants and interviewees with disabilities to enable them to participate successfully in the workplace.

Critical Flow Systems Ltd will provide job applicants with details of the vacant job, i.e. job description, person specification, application form and information about Critical Flow Systems, in alternative formats. We will also make suitable provisions, adjustments etc for interviews and where successful candidates are appointed.

If an employee suffers an injury or illness which affects their ability to do the job, we will provide paid disability leave (which will not be counted as sick leave), offer counselling and support and facilitate any adjustments necessary to enable the employee to return to work. This may include a reallocation of duties, flexibility of working hours and adjustments to equipment. Full consultation on the most suitable arrangements will be held with the employee.

The Equality Act 2010 introduced four new types of disability discrimination, including associative, perceptive, indirect discrimination and discrimination arising from a disability.

For further information pertaining to The Equality Act 2010 please use this link:
<https://www.legislation.gov.uk/ukpga/2010/15/contents>

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	9

5.1.3 COMPLAINTS

Should an employee believe they have experienced harassment, bullying or discrimination then they may either attempt to resolve the matter informally or invoke the formal complaint procedure under CFS's Grievance Procedure to pursue their claim. All cases will be taken seriously, dealt with quickly and treated with the utmost confidence.

5.1.4 MALICIOUS COMPLAINTS

Whilst we do not wish to deter individuals who wish to make genuine complaints, it should be noted that vindictive or vexatious complaints will be viewed seriously CFS Equal Opportunities Policy will be dealt with under the disciplinary procedure. Equally unacceptable is the threat of making an unfounded complaint of discrimination or harassment.

Chris Corris
Directors Signature



Date: 4 July 2023

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	10

6 DATA PROTECTION POLICY

Critical Flow Systems Ltd (CFS) is committed to a policy of protecting the rights and privacy of individuals, including all staff, Customers, Suppliers, Sub-contractors and others, in accordance with the **Data Protection Act 2018**.

For more information on Data Protection Act 2018 please visit www.gov.uk/data-protection

Our data protection policy sets out our commitment to protecting personal data and how we implement that commitment with regards to the collection and use of personal data.

We are committed to:

- ensuring that we comply with the eight data protection principles, as listed below
- ensuring that data is collected and used fairly and lawfully
- processing personal data only in order to meet our operational needs or fulfil legal requirements
- taking steps to ensure that personal data is up to date and accurate
- establishing appropriate retention periods for personal data
- ensuring that data subjects' rights can be appropriately exercised
- providing adequate security measures to protect personal data
- ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- ensuring that all staff are made aware of good practice in data protection
- providing adequate training for all staff responsible for personal data
- ensuring that everyone handling personal data knows where to find further guidance
- ensuring that queries about data protection, internal and external to the organisation, is dealt with effectively and promptly
- regularly reviewing data protection procedures and guidelines within the organisation.

Data protection principles:

- Personal data shall be processed fairly and lawfully.
- Personal data shall be obtained for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under the **Data Protection Act 2018**.
- Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Chris Corris
Directors Signature



Date: 4 July 2023

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	11

7 COVID-19 (Coronavirus) POLICY

7.1.1 General

The health and wellbeing of our employees is a top priority for Critical Flow Systems Ltd. Critical Flow Systems Ltd will take all reasonable steps to ensure that all their staff work in a safe manner whilst carrying out their works operations under these extreme conditions.

CFS staff have, within the water industry, been classified as 'Key Workers' in the UK's COVID -19 response. Letters and information about this key worker status are kept on file in the CFS Business Manual.

7.1.2 Guidance

Reference to Gov.uk and HSE guidelines should be followed in the event of a further pandemic.

<https://www.hse.gov.uk/>

<https://www.gov.uk/coronavirus>

Chris Corris
Directors Signature



Date: 4 July 2023

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	12

8 WHISTLEBLOWING POLICY

8.1.1 General

Whistleblowing is the term used when a worker passes on information concerning wrongdoing. This is called “making a disclosure” or “blowing the whistle”. The wrongdoing will typically (although not necessarily) be something they have witnessed at work.

To be covered by whistleblowing law, a worker who makes a disclosure must reasonably believe two things.

- a) The first is that they are acting in the public interest. This means in particular that personal grievances and complaints are not usually covered by whistleblowing law.
- b) The second thing that a worker must reasonably believe is that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:
 - criminal offences (this may include, for example, types of financial impropriety such as fraud)
 - failure to comply with an obligation set out in law
 - miscarriages of justice
 - endangering of someone’s health and safety
 - damage to the environment
 - covering up wrongdoing in the above categories.
- c) Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It provides the right for a worker to take a case to an employment tribunal if they have been victimised at work or they have lost their job because they have ‘blown the whistle’.

8.1.2 QUALIFYING DISCLOSURES

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that Critical Flow Systems Ltd has committed a “relevant failure” by:

- Committing a criminal offence
- Failing to comply with a legal obligation
- A miscarriage of justice
- Endangering the health and safety of an individual
- Environmental damage
- Concealing any information relating to the above

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen.

CFS Ltd will take any concerns that you may raise relating to the above matters very seriously.

8.1.3 THE PROCEDURE

1. In the first instance you should report any concerns you may have which will be in complete confidence to:
 - a. CFS Managing Director
 - b. Appointed Employees Representative
 - c. Mark Jackson H&S Coordinator <https://www.shrec.org.uk/>
2. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	13

3. If you do not report your concerns to the Managing Director, you should take them direct to the appropriate organisation or body.
4. For more information and advice on Whistleblowing, you can make use of Protect <https://protect-advice.org.uk/>

8.1.4 TREATMENT BY OTHERS

Bullying, harassment, or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner would be subject to disciplinary action. This policy will be reviewed annually or following significant changes.

8.1.5 RESOLVING QUICKLY

Resolving the wrongdoing quickly gives benefits for the organisation if a worker can make a disclosure internally rather than going to a third party. This way there is an opportunity to act promptly on the information and put right whatever wrongdoing is found.

Chris Corris
Directors Signature



Date: 4 July 2023

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	14

9 MODERN SLAVERY ACT 2015

The Modern Slavery Act is a global-leading piece of legislation. It sets out a range of measures on how modern slavery and human trafficking is dealt with in the UK. The Modern Slavery Act came into force in October 2015.

A business must comply if it meets the two criteria below. These rules apply to public and private companies, and partnerships, wherever they are incorporated or formed and in whatever sector they operate.

- Global turnover of over £36m; and
- Conducts business, or part of a business, in any part of the United Kingdom.

Examples of modern slavery and/or human trafficking are:

- Exploitative practices.
- Absence of remuneration.
- Abuse of local employment law.
- Forced or compulsory labour.
- Exploitation of migrant labour.
- Detention of labour.
- Child labour.

9.1.1 Statement

The Act requires compliance from companies with the above criteria. Although Critical Flow Systems Ltd does not have to comply with the Act, Critical Flow Systems Ltd is committed to demonstrating good Corporate Social Responsibility and has therefore decided to implement a Modern Slavery arrangement.

Critical Flow Systems Ltd is committed to meeting the requirements of the Modern Slavery Act 2015. We are strongly opposed to modern slavery and human trafficking in our business operations and supply chains. To be trusted to do the right thing is one of the core values of our company. We would never knowingly engage with suppliers or contractors involved in modern slavery or human trafficking. Critical Flow Systems Ltd will take reasonable steps to ensure compliance within our business activities and supply chain.

9.1.2 What we are doing.

Our Anti-Slavery arrangement sets out Critical Flow Systems Ltd commitment to acting ethically and with integrity in our company and supply chain, and the safeguards we have implemented within Critical Flow Systems Ltd and our suppliers and contractors to comply with the Modern Slavery Act 2015.

Critical Flow Systems Ltd will demonstrate our commitment by undertaking and providing the following:

- Provide training and awareness to all staff.
- Require employees to understand the implications of the Act and our arrangement.
- Provide fair terms and conditions of employment..
- Provide fair rates of remuneration.
- Provide clean, healthy and environmentally friendly working conditions.
- Encourage staff to come forward if they have any concerns related to the Act either within the company (CFS) or in our supply chains.

Chris Corris
Directors Signature



Date: 10 May 2024

Details	Issue Date	Issue Number	Author	Page
Business Policies	10 May 2024	6.7	CL Anderson	15