MODERN SLAVERY ACT STATEMENT

Our Philosophy

At Trillium Flow Technologies (“Trillium” or “we”), we are committed to conducting business in an ethical and sustainable manner. We are sensitive to the risks of modern slavery and human trafficking and are doing our part to ensure it is eradicated.

Our Structure

Trillium Flow Technologies, formerly part of the Weir Group Plc, was established on June 28, 2019. Founded on a legacy of premier products and service, Trillium is a global designer, manufacturer, and provider of mission critical valves, pumps, and aftermarket services in oil and gas, power generation, water and wastewater, and general industry.

We have a business presence in more than 15 countries, with approximately 2,300 employees collaborating with our customers to ensure their success. We aim to be a partner of choice to our customers, with a worldwide network of manufacturing facilities and service centers.

Our innovative approach will deliver the necessary support through design, installation and operation, providing continuity and confidence in flow control.

Supply Chain

Our supply chain includes materials suppliers, marketing agencies, legal and accounting firms, transportation and logistics providers, and other professional services.

As an engineering and manufacturing company, we source raw materials, components and services across the globe and recognize that this may involve sensitive countries and industries. Our suppliers play a critical role in our business, and our relationships with them are based on achieving the best performance, product delivery times, service, and total cost in an ethical and sustainable manner.

Our Policies on Slavery and Human Trafficking

Slavery in all forms, whether slavery, servitude, forced or compulsory labor, or human trafficking (collectively, “Slavery”) is a crime and a fundamental violation of human rights. As a company, we remain absolutely committed to ensuring that there is no form of Slavery in our business and supply chain. We share this ethos with our suppliers and business partners, and we are dedicated to maintaining open and transparent relationships with them to ensure that the highest ethical standards are maintained, regardless of where they are located.

The prevention, detection and reporting of human rights violations in any part of our business or supply chain is the responsibility of all those working for Trillium, and we expect our people to maintain the utmost standards in conformity with these principles.

Our Modern Slavery and Human Rights Policy reflects our commitment to acting ethically and with integrity in all our business relationships. We implement and enforce effective systems and controls to ensure slavery and human trafficking are not occurring anywhere in our supply chains.

[LINK TO MODERN SLAVERY/HUMAN RIGHTS POLICY]

Measures We Have Taken to Identify and Mitigate Risks Include:

- To assist in the detection of such violations, we maintain the Trillium Ethics Hotline. The hotline is available both internally and externally and is a means of reporting concerns relating to any activities which may be considered contrary to our core values and the Trillium Code of Conduct (linked here).
• Where possible, we look to build long-term relationships with suppliers, allowing us to make clear the standards we expect of our partners by way of the Trillium Supplier Code of Conduct.
• We expect our suppliers to have suitable anti-slavery and human trafficking policies and processes. We also expect our suppliers to ensure their supply chains do not use forced labor.

Our Policies

We have a zero-tolerance approach to any form of Slavery and human trafficking. We recognize that our responsibilities extend to our supply chain and are committed to enforcing and maintaining a supply chain process which sets out the minimum standards we expect our suppliers to abide by in connection with:

- how they treat their workforce;
- legal and regulatory compliance;
- health and safety;
- business ethics; and
- environmental standards.

At a minimum, we expect our suppliers to comply with the following requirements:

- no forced, bonded or involuntary prison labor will be utilized;
- no children will be employed; and
- employees of our suppliers shall be paid wages for standard working hours that meet or exceed national minimum requirements.

Our existing Code of Conduct and Modern Slavery and Human Rights Policy set forth the minimum standards expected of our employees and our supply chain. In addition, we expect our employees and suppliers to comply with all applicable laws. Our Modern Slavery and Human Rights Policy has been updated to incorporate the specific requirements of the Act.

Due Diligence

In order to minimize Trillium’s overall supply chain risk, any new supplier must participate in a formal procurement process before appointment. Following appointment, the supply chain is audited periodically. For any supplier who is found to be non-compliant with our policies, we will terminate our relationship unless conditions are immediately improved and compliance is restored.

If any individual, supplier, non-governmental organisation, or other organisation has evidence of Slavery in Trillium’s operations, we encourage them to contact the Trillium Ethics Hotline. Reports will be investigated, and appropriate action will be taken. To date, no Slavery issues relating to the supply chain have been reported to the Trillium Ethics Hotline.

Compliance and Training

Trillium is committed to training its employees on an ongoing basis. The training provides knowledge and guidance on what Slavery is, what preventive measures must be implemented, and what steps should be taken in the event that any concerns are identified in our supply chain. Trillium’s expectation and aim are to not tolerate any business that does not respect basic human rights.

This statement is published by Trillium Flow Technologies and its relevant subsidiaries pursuant to section 54(1) of the UK Modern Slavery Act 2015 (the “Act”) for the financial year ending 31 December 2020.

Signed for and on behalf of Trillium Flow Technologies:

David A. Paradis
Chief Executive Officer