




GROUP POLICY AND PROCEDURE	
ANTI-SLAVERY, HUMAN TRAFFICKING AND CHILD LABOUR POLICY	
AUTHORISED:	 Rob O'Malley Chief Financial Officer
EFFECTIVE DATE:	10 December 2022
POLICY REVIEW DATE:	09 December 2023

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain ("**Modern Slavery**").
- 1.2 South Staffordshire Plc ("**we**", "**our**" or "**us**") and our subsidiary and associated companies set out in Schedule 1 ("**Group Company**") (together "**the Group**") have a zero-tolerance approach to Modern Slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.
- 1.3 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific contractual provisions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.4 Within South Staffordshire Plc, we believe that child labour is not appropriate for our industry and, therefore, the minimum age that recruitment starts from is 16. We do, however, want to give work experience to young people and will continue to do this in a professional, caring and appropriate way. As part of our supply chain management review, we would seek to clarify our suppliers' position with regard to child labour and would endeavour to make sure that any young person is being managed, paid and treated appropriately. Where employees have contact with young people through our client network, we make sure that the appropriate DBS checks are carried out.

2. ABOUT THIS POLICY

- 2.1 This policy has been approved by the Chief Finance Officer and any questions or concerns about the operation of this policy should be referred, in the first instance, to the Chief Finance Officer.
- 2.2 The purpose of this policy is the prevention, detection and reporting of Modern Slavery in any part of the Group's business and supply chains and this policy requires anyone, who believes or suspects that Modern Slavery is taking place in any part of the Group's business or the supply chains of any supplier, to report this as soon as possible.

3. WHO DOES THIS POLICY APPLY TO

This policy applies to all persons working for us and persons or organisations working on our behalf in any capacity, including employees at all levels, directors, officers, agency workers,



seconded workers, volunteers, agency workers, agents, contractors, external consultants, supplier's, third party representatives and business partners.

4. COMPLIANCE WITH THIS POLICY

- 4.1 You must ensure that you read, understand and comply with this policy.
- 4.2 The prevention, detection and reporting of Modern Slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.
- 4.3 Management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given appropriate training.
- 4.4 This policy does not form part of an employee's contract of employment and it may be amended at any time.
- 4.5 Any employee who breaches this policy will face disciplinary action, which could result in dismissal.
- 4.6 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

5. RAISING A CONCERN

- 5.1 If you have a concern or believe or suspect that Modern Slavery is taking place in any part of the Group's business or the supply chains of any supplier or believe or suspect that a breach of this policy has occurred or may occur, you should notify your line manager, in the first instance, as soon as possible. You should not approach or accuse individuals directly or attempt to investigate the matter yourself.
- 5.2 Where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason you can report your concerns in accordance with the Group Whistleblowing Policy.
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- 5.4 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the supply chains operating in each Group Company constitutes Modern Slavery, raise it with your line manager in the first instance.
- 5.5 In some cases, your line manager may refer your concern and/or suspicions to the Chief Finance Officer.

6. SUPPORT

- 6.1 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 6.2 If we conclude that a person has made false allegations maliciously, in bad faith, vexatiously or with a view to personal gain, that person will be subject to disciplinary action, which may result in dismissal and we may terminate our relationship with other individuals and organisations.
- 6.3 We are committed to ensuring that no-one suffers detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery is or may be taking place in any part of our business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern (subject to paragraph 6.2). If you believe that you have suffered any such treatment you should inform one of the officers referred to in the Group Whistleblowing policy immediately. If the matter is not remedied and you are an employee you should raise it formally using our Grievance Procedure.

7. PRACTICES AND PROCEDURES

- 7.1 Each Group Company is responsible for establishing practices and procedures to ensure compliance with this policy and must:
 - (a) carry out risk assessments and implement actions identified;
 - (b) include training on this policy in employee inductions and provide further training as appropriate;



- (c) develop supplier codes of conduct or supplement existing supplier codes of conduct;
- (d) carry out appropriate checks within their supply chains;
- (e) include contractual obligations in purchase and supply contracts prohibiting Modern Slavery and requiring third parties to comply with this policy and;
- (f) communicate this policy to employees and external third parties.

8. RESPONSIBILITY FOR THIS POLICY

The Chief Finance Officer has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

9. COMMUNICATION AND AWARENESS

9.1 Training on this policy and the risks our businesses face from Modern Slavery, forms part of the induction process for employees and regular training will be provided as necessary.

9.2 Our zero tolerance approach to Modern Slavery must be communicated to all employees and other individuals and organisations.

10. MONITORING AND REVIEW OF THE POLICY

This policy will be reviewed on an annual basis by the Chief Finance Officer or in response to legislative or business requirements.

11. RELATED POLICIES

11.1 This policy should be read in conjunction with the following:

- (a) each Group Company's Grievance and/or Disciplinary Policies; and
- (b) the Group Whistleblowing Policy.



Schedule 1 – Subsidiary and Associated Companies

South Staffordshire Water Plc

Echo Managed Services Limited

Echo Northern Ireland Limited

Grosvenor Services Group Limited

SSI Services (UK) Limited

Integrated Water Services Limited

G Stow Plc

Hydrosave UK Limited

Advanced Engineering Solutions Limited

Office Watercoolers Limited

Omega Red Group Limited

Onsite Central Limited