

SOUTH STAFFORDSHIRE WATER PLC

Modern Slavery and Human Trafficking Statement for Financial Year Ending 31 March 2023

This statement is published in accordance with the provisions of the Modern Slavery Act 2015 on behalf of South Staffordshire Water Plc for financial years up to and including end of March 2024.

About South Staffordshire Water Plc

We are part of the South Staffordshire Plc group of companies. South Staffordshire Plc is the intermediate parent company of South Staffordshire Water Plc and has read and fully supports South Staffordshire Water Plc's modern slavery and human trafficking statement. More information about South Staffordshire Plc and a copy of its statement can be found at <http://www.south-staffordshire.com/>

South Staffordshire Water Plc supplies high quality drinking water in the West Midlands, South Staffordshire, South Derbyshire, North Warwickshire and North Worcestershire areas.

Following our merger with Cambridge Water Plc in April 2013, we also provide water to customers in Cambridge, extending to Ramsey in the north, Gamlingay in the west, Balsham in the east and Melbourn in the south.

Approximately across both businesses we supply water to 1.7m people, and 42,500 commercial customers.

Both businesses operate under a single water licence.

Background

As a subsidiary of South Staffordshire Plc, South Staffordshire Water Plc is subject to Group policies which includes sourcing policies, positions, and statements. We are committed to conducting our business operations in a manner that respects human rights and complies with applicable laws and regulations. In addition, we are also committed to taking steps to ensure that slavery and human trafficking is not taking place in any part of our supply chain or business.

Our Human Trafficking and Sustainability Policies make explicit our commitment to ensure that slavery and human trafficking is not taking place in any part of our businesses or in any part of our supply chain. All suppliers are expected to comply with South Staffordshire Plc's Human Trafficking and Sustainability Policies.

Reporting and Policies.

Our Code of Conduct and Business Ethics Policies are communicated as applicable to our employees, suppliers, and contract workers. For suppliers specifically the Supplier Code of Conduct is issued as part of the Supplier vetting process. Our policies encourage individuals to report any wrongdoing which extends to human rights violations like slavery and human trafficking. All reports are fully investigated, and appropriate remedial actions taken when warranted.

All levels of risk and any potential risk are and will be reported through our business risk matrix process. Any risks identified and ongoing compliance are reported to and investigated by our internal audit team through our South Staffordshire Water Plc Audit and Risk Committee.

Raising Concerns

Anyone that may have a concern about modern slavery or human trafficking is encouraged to report this to a manager in the first instance or alternatively Human Resources. Where the matter is not suitably resolved or it is felt more serious, this can be reported through the Company Whistleblowing Policy. Matters can also be discussed with the Head of Legal Services.

Our Supply Chain

We are committed to providing high-quality water, exceptional levels of service and great value for money. Our supply chain includes contractors of varying sizes and expertise, ranging from large framework suppliers delivering significant capital works, IT suppliers delivering system solutions and business change projects, large scale parts and equipment for major projects and smaller services contracts and suppliers of consultancy, goods and materials. It is our goal to work collaboratively with our suppliers to exceed our customers' increasing expectations. We expect our suppliers to conduct their operations in a socially and environmentally responsible manner, aligning with our values and ethics policies. We understand that our biggest exposure to slavery and human trafficking is in our supply chain. We have Supplier Code of Conduct which is applicable to all suppliers and prohibits the use of forced, bonded, indentured, involuntary prison or slave labour, and requires suppliers to comply with anti-slavery, labour, and wage laws. We have standard aligned contract terms which contain a clause by which suppliers commit to adhere to our Supplier Code of Conduct.

We expect our suppliers to have a compliance plan in place to ensure that human trafficking and forced labour are not used and that risks of worker exploitation are mitigated. We will continue to promote and encourage our suppliers to take steps to ensure that slavery and human trafficking is not taking place in any part of our supply chain or in any part of their businesses. We expect our suppliers to conduct due diligence on their respective supply chains and to assist us with our compliance with these rules.

To the extent that a supplier refuses to cooperate with our compliance efforts, we may reconsider our supply arrangement and implement remedies available to us.

Our Employees

South Staffordshire Water Plc employs around 430 employees within the UK. Our recruitment process uses a combination of an in-house recruitment team and when applicable external recruitment agencies. We carry out base line background checks for confirmation of identity, entitlement to work in the UK, criminal records and financial checks for all new staff. All hired staff, and certain supply chain providers, have these checks prior to confirmation of engagement. More thorough checks are made for staff in roles with access to clean water production and to operational telemetry.

As part of the hiring process, staff are provided with a written employment agreement that contains a description of terms and conditions of employment and the nature of the work being undertaken. Staff are not required to pay recruitment fees or other related fees for their employment.

All work is voluntary, and staff are free to terminate their employment and leave work at any time.

Training

As an enhancement to our employee business ethics training and Supplier Code training for those working with external suppliers, South Staffordshire Water Plc will implement a further training module which enables employees to spot and

respond to the signs of slavery and human trafficking, this will be delivered on an annual basis.

In the forthcoming year we will continue to improve our sourcing processes, formalise our benchmarking standards and key performance indicators and audit our approach against regulatory requirements and available guidance.

This statement constitutes South Staffordshire Water Plc's modern slavery and human trafficking statement for the financial year ending 31 March 2023 and was approved by the Board on [Date to be completed].

Andy Willicott
Managing Director
South Staffordshire Water Plc