



# Modern Slavery Statement

## Modern Slavery and Human Trafficking Statement for Financial Year Ending 31 March 2024

This is a statement on behalf of South Staffordshire Plc and its subsidiary companies ("Group"), and is published in accordance with the provisions of the Modern Slavery Act 2015.

### 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.

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

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## Group Structure

South Staffordshire Plc is a holding company, and the Group is owned by investors, who are advised and managed by Arjun Infrastructure Partners Limited. South Staffordshire Plc provides support services to its subsidiaries who operate in a range of sectors from a regulated water company to companies offering a range of non-regulated services and products to essential operators and markets.

## Reporting and Policies

Group-wide policies, including those related to sourcing, human trafficking, and sustainability apply to all companies in our Group. 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 committed to taking proactive steps to ensure that modern slavery and human trafficking are not present in any part of our supply chain or business.

Our Anti Human Trafficking and our Sustainability Policies clearly outline our commitment to preventing slavery and human trafficking across all our operations and within our supply chain. All suppliers are expected to comply with South Staffordshire Plc's Anti Human Trafficking and our Sustainability Policies.

Our Business Ethics Policies are communicated to employees, suppliers, and contract workers. Specifically, the Supplier Code of Conduct is issued as part of the supplier vetting process. These policies encourage individuals to report any wrongdoing, including human rights violations like slavery and human trafficking. All reports are thoroughly investigated, and appropriate remedial actions are taken when necessary.

All levels of risk, including any potential risks, are identified and these risks, along with ongoing compliance efforts, are regularly reported to and investigated by our internal audit team and monitored by the Audit and Risk Committees of each Group company.

## Raising Concerns

Anyone with concerns about modern slavery or human trafficking is encouraged to report these to a manager or the Human Resources department. If the matter remains unresolved or is considered more serious, it can be escalated through the Group Whistleblowing Policy.

## Our Supply Chain

We are committed to providing high-quality services, exceptional levels of customer service, and value for money across all our subsidiaries. Our supply chain includes contractors of varying sizes and expertise, from large framework suppliers involved in capital works, IT systems, and business change projects to suppliers of consultancy, goods, materials, and smaller service contracts. It is our goal to work collaboratively with suppliers to exceed customer expectations, and we expect them to conduct their operations in a socially and environmentally responsible manner, aligned with our values and ethics policies.

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We recognise that the biggest exposure to slavery and human trafficking lies within our supply chain. Our Supplier Code of Conduct applies to all suppliers and prohibits the use of forced, bonded, indentured, involuntary prison, or slave labour, while also requiring compliance with anti-slavery, labour, and wage laws. Standardised contract terms include clauses that require suppliers to adhere to this code.

We expect suppliers to have a compliance plan in place to prevent human trafficking and forced labour, and to mitigate risks of worker exploitation. We will continue to encourage our suppliers to take these steps. Additionally, we expect suppliers to conduct due diligence on their own supply chains and assist us in ensuring compliance with these standards.

If a supplier refuses to cooperate with our compliance efforts, we may reconsider the supply arrangement and take remedial action as necessary.

## Our Employees

The Group employ circa 2800 staff across the UK. Our recruitment processes involve both an in-house team and, where applicable, external recruitment agencies. We conduct standard background checks for all new employees, which include verifying identity and right to work in the UK. Where applicable, criminal and financial checks are also performed. More thorough checks are conducted for staff in roles with critical operational responsibilities.

As part of the hiring process, employees receive a written employment agreement detailing terms and conditions of employment, as well as the nature of the work. Employees do not have to pay recruitment fees or other related fees for their employment.

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

## Focus Areas

All Group companies comply with the general principles set out in this statement, but the following companies have built on those general principles during the year.

South Staffs Water is a water-only company, supplying around 1.6 million customers in the South Staffordshire and Cambridge regions. South Staffs Water continues its efforts to eliminate risks related to modern slavery and human trafficking.

SSI Services (UK) Limited and its subsidiary companies:

Integrated Water Services Limited ("IWS") IWS operates two specialist divisions: (i) IWS Water Hygiene provide specialist services and solutions for all aspects of water treatment and water hygiene services; and (ii) the Mechanical & Engineering division provide energy management and pump testing, fabrication services, chemical dosing and pump refurbishment / workshop services

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Over the past year the Companies have focussed on the following areas including:

- **Supplier Code of Conduct:** All suppliers are required to adhere to Codes of Conduct, which prohibits forced labour and requires compliance with labour and wage laws. The codes have been reinforced with additional due diligence checks on suppliers and partners.
- **Risk Assessment and Auditing:** The Companies have continued to undertake risk assessments within its supply chain, with regular audits and reviews of compliance through their internal audit and risk committees.
- **Employee Training:** Awareness Training has been implemented for employees in South Staffs Water and IWS, focusing on identifying and responding to signs of modern slavery, with an emphasis on supply chain management and procurement practices. In Onsite a modern slavery module has been built into its induction programme.
- **Whistleblowing and Reporting:** The Companies encourage the reporting of any concerns related to modern slavery through established whistleblowing channels. All reports are fully investigated, and appropriate action is taken where necessary.

## Commitments for 2024/25

As part of our ongoing commitment, South Staffordshire Plc and its subsidiary companies will continue to:

- review and update our Supplier Code of Conduct across all subsidiaries.
- increase the frequency of supply chain audits, with a focus on high-risk sectors and suppliers.
- provide training for employees on recognising and addressing modern slavery.

This statement constitutes South Staffordshire Plc and its subsidiary companies "Modern Slavery and Human Trafficking Statement for the financial year ending 31 March 2024" and was approved by the South Staffordshire Plc Board of Directors on 26 September 2024.

### Charley Maher

Group CEO

South Staffordshire Water Plc



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