# MODERN DAY SLAVERY & HUMAN TRAFFICKING STONBURY GROUP STATEMENT FINANCIAL YEAR 2023 - 2024

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**Stonbury is committed to protecting and respecting human rights and has a zero-tolerance approach to slavery and human trafficking in all its forms. We recognise that modern slavery is a significant global human rights issue. We will act ethically and with integrity in all our relationships and use all reasonable endeavours to influence others to ensure slavery and human trafficking is not taking place in areas linked to our business. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken and will take in relation to slavery and human trafficking.**

## OUR BUSINESS

Stonbury is an agile, direct delivery specialist contractor to both the water industry and wider water environment, with an emphasis on delivering innovative, low carbon and high-quality reliable solutions. We work with UK's water companies and the Environment Agency - either directly or through their major supply chains - to deliver high value, low carbon solutions across their asset estates. This includes works on potable water, wastewater treatment centres and nature-based 'green' and 'grey' solutions that deliver smart, low carbon environmental engineering.

## POLICIES AND MEETING THE REQUIREMENTS OF THE MODERN SLAVERY ACT,2015

Stonbury's policy on Modern Day Slavery & Human Trafficking has been updated to reflect our responsibilities under the Modern Slavery Act, 2015 and our commitment to acting ethically and with integrity in all our business relationships.

- The Board of Directors has overall responsibility for demonstrating, through clear and visible leadership, that human rights are integral to the way we do business.
- The Directors are also responsible for monitoring compliance with the policy in all aspects of our business.
- Managers and supervisors provide visible leadership that promotes human rights as an equal priority to other business matters.
- We also believe that all our employees are responsible for helping to ensure that we operate free from human trafficking, human rights abuses, slavery and forced labour.
- We will report any instances where we identify common signs of forced labour ('all work or service which is extracted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.'), in line with the International Labour Organization (ILO) guidance.
- We are taking a risk-based approach to maximise effectiveness whilst being cognisant of our operational reach and scope.

We have a number of policies and values which together address our commitment to mitigate the risk of modern slavery and human trafficking taking place within our businesses and in our supply chain, as well as ensuring we act ethically and with integrity in all our business relationships.

This includes our policies and values on:

- Anti-bribery & Corruption
- Whistleblowing
- Equality, Diversity and Inclusion – including Fixed-term Employees and Agency Workers
- Recruitment and Selection
- Employee Handbook
- Sustainability Commitment

## ORGANISATIONAL STRUCTURE & SUPPLY CHAIN

We recognise that our responsibility for human rights, labour conditions and anti-slavery encompasses:

- Employees – Our staff are based in the UK and we do not normally undertake work overseas. We are a fair employer, members of the Living Wage Foundation and ensure that our company values and policies are communicated to all employees.
- Our Supply Chain– It is our aspiration that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions. We procure the majority of our directly sourced materials from UK based organisations that are required to comply with UK laws on forced labour. Review and assessment processes are carried out across our supply chain to ensure their commitment to the requirements of the Modern Slavery Act.
- Subcontractors - The Government has recognised the construction sector as being a high-risk industry for modern slavery and associated issues. As such, our continued focus is vetting and monitoring those subcontract companies who supply us with labour trades to support our contracts.
- Our Customers– We are an ethical business and continue to meet the high standards of our customers by achieving the required assessment criteria and meeting the demands of independent, external audits. We also comply with customers' Codes of Conduct and policy requirements.

## DUE DILIGENCE PROCESSES

As part of our initiative to identify and mitigate risk we have taken steps to remove slavery or human trafficking in our supply chain. We therefore acknowledge our duty to continually review and monitor our supply chain and subcontractors, labour agencies and any other related third parties.

Regular vetting and auditing take place to:

- Monitor, review and update our approved supplier/subcontractor vetting process.
- Ensure that suppliers have policies and procedures in place to vet and monitor their supply chain, especially where this is not located in the UK.
- Develop long-term relationships within our supply chain, especially companies/individuals who hold similar values to ourselves.
- We will continue to monitor the supply chain to assess the risk of slavery and human trafficking being present and develop measures to further mitigate against any such risk.
- If we identify anyone within our supply chain who are at a higher risk of unfair working practices, modern slavery or human trafficking, we will undertake a more in-depth assessment and require those suppliers, manufacturers, consultants, contractors and sub-contractors to complete a detailed self-assessment questionnaire.

Our recruitment processes are reviewed regularly. We have procedures in place for the vetting of new employees and undertake references and checks to confirm their identities. Employees are paid directly into an appropriate, personal bank account. We have policies and procedures in place to ensure compliance with UK employment and human rights laws and all staff are remunerated fairly and above the UK's national living wage. We encourage employees to report in good faith any issues or concerns they may have regarding unethical business practices.

## TRAINING ON MODERN SLAVERY

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and our supply chains, we have an ongoing training programme in place to ensure our permanent employees are trained in our respective policies and procedures alongside training on the wider topic from an external provider to ensure the content is up-to-date and accurate. The aim is that employees are not only aware of the topic, but are also familiar with the warning signs and know what action to take.

**ACTIONS FOR 2023-2024**

We have reinforced our commitment to our legal obligations by registering with the Government's Digital Registry, to promote further the positive steps Stonbury is taking and to send a strong signal to our customers and shareholders about the value of transparency.

Awareness

- All staff continue to be provided with annual online compulsory training which delivers information on the definition of modern slavery and human trafficking and practical examples of how slavery and/or human trafficking can take place within our businesses and our supply chains. The training also includes a refresher on the steps to take should an employee have a concern about potential modern slavery.
- Reinforce the training with literature on site and inclusion in site briefings.
- Continue to encourage our staff and anyone in our supply chain to report in good faith any issues or concerns they may have regarding unethical business practices.

Supply chain & Sub-contractors

- Continue to review the areas identified as having the highest risk.
- Staff at key labour contractors to have awareness training.

**APPROVAL**

Signed by the Chief Executive Officer



Trevor Hoyle
01/11/23