Modern slavery and human trafficking statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 31 March 2023.

Introduction

Ancala Water Services (Defence) Limited is committed to preventing slavery and human trafficking occurring in any of its corporate activities, and to ensuring that our supply chains are free from such practices.

Our organisational structure and operations

Ancala Water Services deliver water and waste water to over 1,100 sites throughout England and Wales delivering water, wastewater, fire system maintenance and specialist estate management services working in the Water - Utilities industry.

Our head office is at Unit 1B Redbrook Business Park, Wilthorpe Road, Barnsley, S75 1JN.

We employ between 130-140 people within the UK and operate in England and Wales only. We have a total annual turnover of £60 million.

Nature of our supply chains

Our supply chain includes the provision of goods and services that support the delivery of water and waste water services to our customers. We have risk assessed our supply chain and consider our business activities to be low risk and predominately based within the UK.

Policies relating to slavery and human trafficking

Our Anti-Slavery Policy reflects our commitment in implementing and enforcing effective procedures and controls to minimise the risks of human trafficking and other modern slavery practices infiltrating our business operations or supply chains, and to acting ethically and with integrity in all our business activities and relationships.

We ensure that our suppliers are aware of our policies and take appropriate measures to ensure that our suppliers adhere to the same high standards.

Our policies have been developed internally and in conjunction with our internal Employee Forum and representatives, legal advisors, risk assessors and platforms.

Risk assessment

We risk assess our supply chain via our Supplier Pre-Qualification/Re Qualification process to assess which of our own activities and supply chain represents the highest risk in respect of slavery or human trafficking.

Our supply chain has been assessed and we consider our business activities to be low risk.

Our terms and conditions require all suppliers to comply with applicable laws, statues, regulations and our Anti-Slavery Policy. Failure to comply will result in a breach of contract and therefore rights for termination of any existing agreements.

Due diligence processes in relation to slavery and human trafficking

In order to monitor and mitigate the risks of slavery and human trafficking occurring within our supply chain we undertake pre-screening of prospective Suppliers as part of our tender processes, to assess the effectiveness of their existing safeguarding controls and practices, including but not limited to, those in relation to preventing modern slavery occurring within their

organisation and supply chain. Provision of associated policy documents and supporting documentary evidence is a requirement of this process.

Our contractual documentation incorporates specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour. In the event of any known or suspected incident in relation to slavery or human trafficking by an Associated Party, or failure to comply with these requirements may result in termination of any agreements.

We have in place the following policies, procedures and agreements which form part of our approach to mitigate against the risk of modern slavery within our company or our supply chain:

- Anti-Slavery Policy
- Code of Ethics
- Whistleblowing Policy
- Equal Opportunities Policy
- Anti-harassment Policy
- Grievance Policy and Procedure
- Supplier Onboarding and Requalification Procedure and Policy

In this financial year, we have revised our Grievance Policy and Procedure, Equal Opportunities Policy and Anti-harassment Policy.

Staff training

We require all staff to complete modern slavery training to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively apply our policies and procedures aimed at mitigating this risk.

We also require our contractors, agents and suppliers to provide such training to their own staff**.**

We make specific provision in our Whistleblowing Policy for the protection of individuals who report concerns about suspected wrongdoing.

Monitoring of our Anti-Slavery Policy

We intend to use the above and internal procurement procedures to monitor how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

Future action

We aim to take the following further steps over the course of the next financial year:

- Revise our Code of Ethics and raise staff awareness of the code.
- Deliver online modern slavery awareness training.
- Deliver training and raise awareness in relation to anti-harassment and dignity at work.
- Review our Whistleblowing Policy.
- Review our procurement procedures, including an updated risk analysis and assessment.
- Review the above policies in line with legislation and implement any updates required.

The Company pledges to review, on an annual basis, the effectiveness of this statement to ensure that there is no slavery or human trafficking in our supply chains.

This statement was approved by the Board of Ancala Water Services (Defence) Limited on 12 April 2023.

Signed:

Mike Howarth
Chief Executive Officer
Ancala Water Services (Defence) Limited

Date: 12th April 2023