



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

Modern Slavery and Human Trafficking Statement

This is a statement on behalf of South Staffordshire Plc and its subsidiary companies (“Group”) and is in support of those businesses within the Group who are required to publish a modern slavery and human trafficking statement under the Modern Slavery Act 2015.

This statement reflects our zero-tolerance approach to slavery and human trafficking and sets out steps our Group has taken to ensure that modern slavery and human trafficking is not taking place in the supply chain or in any part of our Group.

Our 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 operating in a range of sectors from regulated water supply to waste, water and infrastructure, compliance, utilities, services and software. The following businesses within the Group must publish modern slavery and human trafficking statements under the Modern Slavery Act 2015:

- **South Staffordshire Water Plc** – is a water only company, supplying around 1.6 million customers in the South Staffordshire and Cambridge regions. The Modern Slavery and Human Trafficking Statement for this business can be found at <https://www.south-staffs-water.co.uk/modern-slavery-statement>.
- **SSI Services (UK) Limited’s** subsidiary companies: Integrated Water Services Limited a leading supplier of legionella control services and mechanical and electrical services and Onsite Limited whose services include the maintenance of water and wastewater essential infrastructure and assets. Modern Slavery and Human Trafficking Statements for these businesses can be found at:
 - a. <https://onsite.co.uk/wp-content/uploads/2023/06/Modern-Slavery-and-Human-Trafficking-Policy-2023.pdf>
 - b. <https://azv503.n3cdn1.secureserver.net/wp-content/uploads/2022/09/IWS-Modern-Slavery-Human-Trafficking-Statement-FINAL.pdf>

Our policy reflects our commitment to ensuring that there is no slavery or human trafficking in our Group. It shows our commitment to acting ethically and with integrity in our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the supply chain or any part of our Group.

Our Employees

Our Group employs around 3,000 employees. 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 and entitlement to work in the UK. All hired staff, and certain supply chain providers, have these checks prior to confirmation of engagement.

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.

Code of Conduct and Business Ethics Policies are communicated as applicable to our employees, suppliers, and contract workers. Our policies encourage individuals to report any wrongdoing which extends to human rights violations like slavery and human trafficking.

Our employees receive some training on modern slavery and human trafficking. We intend to introduce 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.

Our Supply Chain

Supply chains across our Group companies include 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, smaller services contracts and suppliers of consultancy, goods and materials as well as subcontractors to support various projects. We expect our suppliers to conduct their operations in a socially and environmentally responsible manner and understand that our biggest exposure to slavery and human trafficking is in the supply chain.

Our businesses have policies and procedures in place prohibiting forced, bonded, indentured, involuntary prison or slave labour including supplier codes of conduct and/or supplier checklists. We expect our suppliers to comply with modern slavery, labour and wage laws. We also expect suppliers to adopt our Group Modern Slavery and Human Trafficking Policy or to have their own policies in place. Any instances of non-compliance are considered on a case-by-case basis, remedial action will be taken and if appropriate may include terminating our relationship with a supplier.

Risk & Assurance

Group businesses have supplier due diligence processes in place such as supplier codes of conduct and/or supplier checklists. Any risks identified and ongoing compliance may be reported to and investigated by our internal audit team through relevant Audit & Risk Committees. Some Group businesses benchmark their activities against relevant performance criteria.

Reporting Concerns

Anyone that may have a concern about modern slavery and human trafficking is encouraged to report this to a manager in the first instance. Where the matter is not suitably resolved or it is felt to be more serious, this can be reported through our Whistleblowing Policy. Matters can also be discussed with the Group General Counsel.

Continuous Improvement

In the forthcoming year we will formalise our key performance indicators, strengthen our risk and assurance mechanisms, introduce a training module, and audit our approach against regulatory requirements and available guidance.

This statement constitutes the Group's modern slavery and human trafficking statement for the financial year ending 31 March 2023 and was approved by the Board on 29 November 2023.



Charley Maher

Group Chief Executive

South Staffordshire Plc