



South Staffordshire Group

Modern Slavery and Human Trafficking Statement 2026

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Modern Slavery and Human Trafficking Statement

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 on behalf of South Staffordshire Limited and its subsidiary undertakings, South Staffordshire Water Plc, SSI Services (UK) Limited and OnSite Central Limited, together referred to as the “Reporting Companies”. It describes the steps taken by the Reporting Companies and provides an overview of the wider Group’s approach to preventing modern slavery, human trafficking, forced labour and other human rights abuses.

The Group operates across the regulated water, infrastructure, engineering, technology and business services sectors. Its operations are principally based in the United Kingdom, supported by overseas operations and service centres involved in delivering services to customers and clients. The Group is owned by investors whose investments are advised and managed by Arjun Infrastructure Partners Limited.

The Group has zero tolerance for modern slavery, human trafficking, forced labour and other human rights abuses. We are committed to conducting business ethically and responsibly and to identifying, assessing and addressing related risks within our operations, supply chains and wider business relationships.

This statement explains the steps taken during the financial year ended 31 March 2026 and outlines the actions planned to strengthen the Group’s approach in 2026/27.

Governance and Policies

The Group’s approach to modern slavery and human rights is supported by a framework of policies, procedures and governance arrangements designed to promote ethical conduct, responsible business practices and compliance with applicable laws.

During the reporting period, the Group reviewed and updated its Modern Slavery, Human Trafficking and Human Rights Policy. The updated policy establishes minimum standards and expectations across the Group and supports a risk-based approach to identifying, assessing and managing modern slavery, human trafficking and wider human rights risks. It also requires each Group business to maintain procedures and controls proportionate to the nature of its operations, workforce arrangements and supply chains.

The policy is supported by the Group’s wider governance framework, including policies and procedures relating to whistleblowing, recruitment, right-to-work compliance, environmental responsibility, ethical conduct and responsible business practices. Together, these arrangements support the Group’s commitment to preventing exploitation, protecting human rights and providing appropriate mechanisms for concerns to be raised and investigated.

Modern slavery and human rights also form part of the Group’s wider ESG programme. Since its establishment in 2024, the ESG Working Group has brought together representatives from across the Group to collaborate on ESG priorities, share good practice, identify opportunities for improvement and support the implementation of agreed initiatives. Modern slavery, responsible sourcing and ethical supply-chain management remain important areas of focus within that programme.

Understanding Our Risks

The Group recognises that the risk of modern slavery and human rights abuses is not confined to any single sector, geography or business activity. Potential risks may arise through direct employment, the use of agency workers and subcontractors, outsourced services, labour-intensive activities and the operation of complex domestic and international supply chains.

The nature and level of risk may vary across different parts of the Group and its supply chains. In assessing these risks, the Group considers a range of factors, including workforce arrangements, recruitment practices, the use of third-party labour, supplier relationships, geographic location and the nature of goods and services provided.

During the reporting period, the Group did not identify any instances of modern slavery or human trafficking within its operations. However, we recognise that modern slavery risks continue to evolve and that effective prevention requires ongoing vigilance, robust governance and continuous improvement.

Consistent with our Modern Slavery, Human Trafficking and Human Rights Policy, we continue to enhance our understanding of actual and potential human rights risks across our operations, suppliers and business relationships. This includes ongoing assessment of recruitment practices, workforce management, supplier due diligence and broader supply-chain activities to support a risk-based approach to prevention, detection and response.

Supply Chain Due Diligence

The Group works with a diverse range of suppliers across the regulated water, infrastructure, engineering, technology and business services sectors, including providers of construction and engineering services, professional services, technology solutions, materials, equipment and operational support. We recognise that the risk of modern slavery and human rights abuses is often greatest within complex supply chains and therefore continue to strengthen our supplier due-diligence and assurance arrangements.

During the reporting period, the Group continued to develop its supplier onboarding and assurance processes to improve visibility of supplier information, accreditations, certifications and policy documentation. The Group also continued to use Risk Ledger as part of its supplier assurance activities. Supplier assessments include consideration of ethical labour practices, human rights compliance, modern slavery controls and whether any instances of modern slavery have been identified within suppliers' own organisations or supply chains.

The Group's Modern Slavery, Human Trafficking and Human Rights Policy sets expectations for suppliers to maintain appropriate controls to prevent forced labour, human trafficking and worker exploitation. Suppliers are encouraged to undertake proportionate due diligence within their own supply chains. Where concerns are identified, the Group seeks to engage constructively with suppliers to understand the nature of the issue and determine an appropriate response. Depending on the circumstances, this may include enhanced due diligence, corrective-action plans, further monitoring, escalation or, where necessary, suspension or termination of the supplier relationship.

During the year, the Group also considered opportunities to further align supplier requirements and contractual arrangements with its updated policy framework. This work forms part of the Group's ongoing commitment to

strengthening responsible sourcing practices, improving supply-chain transparency and embedding a consistent approach to supplier governance across its businesses.

Our Employees

The Group employs approximately 2,600 colleagues across its businesses.

We are committed to ensuring that all individuals working for the Group are treated fairly, lawfully and with dignity and respect. Recruitment processes are designed to support compliance with employment and immigration legislation and to reduce the risk of labour exploitation.

Identity and right-to-work checks are undertaken for employees and, where appropriate, agency workers, subcontractors and self-employed personnel. During the reporting period, enhanced right-to-work training was delivered to managers and compliance reviews were undertaken to support adherence to internal processes.

The Group has also continued to strengthen controls relating to off-payroll workers, ensuring that appropriate checks are completed before individuals commence work and that relevant contractual arrangements are in place.

All employees receive written terms and conditions of employment. No recruitment fees are charged to workers by the Group, and all employment is entered into voluntarily. Individuals are free to leave their employment in accordance with the terms of their employment contract.

Training, Awareness and Reporting

The Group recognises that awareness and vigilance are important components of any effective modern slavery programme.

Employees continue to receive training and guidance relevant to their roles, including induction training and updates relating to modern slavery, human rights and responsible business practices. Particular focus has been placed on supporting managers in understanding recruitment controls, right-to-work requirements and their responsibilities in identifying and escalating concerns.

The Group encourages employees, suppliers and other stakeholders to raise concerns regarding actual or suspected instances of modern slavery, human trafficking or other human rights abuses. Concerns may be raised through management, Human Resources, Group Legal or the Group's whistleblowing arrangements.

Reports are managed in accordance with established policies and procedures and are investigated where appropriate.

Progress During 2025/26

Key activities undertaken during the reporting period included:

- review and update of the Group's Modern Slavery, Human Trafficking and Human Rights Policy;
- continued operation of the ESG Working Group and integration of modern slavery considerations into the Group's wider ESG programme;
- continued utilisation of supplier onboarding and assurance processes to support supplier due diligence;
- ongoing use of Risk Ledger supplier assurance assessments, including questions relating to ethical labour practices, human rights compliance and modern slavery controls;
- delivery of enhanced right-to-work training and compliance reviews;
- strengthening of controls for agency workers, subcontractors and other off-payroll workers;

- continued promotion of whistleblowing and reporting mechanisms throughout the Group;
- consideration of ethical supply chain management as part of the Group's broader ESG activities;
- updates to contractual terms to promote compliance with Group policies on modern slavery;
- development of a new intranet providing comprehensive and centralised location for all company policies
- introduction of bank account verification functionality within HR systems to strengthen controls that may assist in identifying indicators of labour exploitation; and
- implementation of new onboarding arrangements and improvements to employee policy visibility through planned digital platforms.

Focus for 2026/27

The Group recognises that addressing modern slavery requires continuous improvement. During the next reporting period we intend to continue strengthening our approach through:

- further development of the Group's overarching modern slavery and human rights risk assessment framework;
- implementation of a country and jurisdiction risk-rating framework to support supplier due diligence, identify locations presenting elevated modern slavery and human rights risks, and establish enhanced approval, monitoring and restriction controls where appropriate;
- strengthening contractual requirements for suppliers, where appropriate and proportionate;
- continued enhancement of supplier due diligence and supplier assurance activities;
- progression of ethical supply chain and responsible sourcing initiatives through the ESG programme;
- ongoing review of policies, procedures and governance arrangements to maintain alignment with evolving legislation and recognised good practice;
- continued training and awareness activities for employees involved in recruitment, procurement, supplier management and contract administration;
- introduction of a Prevention of Illegal Working Policy formalising right to work verification requirements, ongoing monitoring arrangements and responsibilities for employees and contingent workers; and
- implementation of Identity Document Validation Technology to strengthen right to work checks.

The Group remains committed to preventing modern slavery and human trafficking and to continually improving the effectiveness of its governance, due diligence and risk management arrangements

Board Approval

This statement constitutes the Modern Slavery, Human Trafficking and Human Rights Statement of South Staffordshire Limited and the Reporting Companies for the financial year ended 31 March 2026. It was approved by the Board of Directors of South Staffordshire Limited on 30 September 2026.



Steve Johnson

Chair

for and on behalf of the Board

Version Control

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V4.0	GL-0011	30/09/26	01/10/27	Group Legal	SSL Board