



South Staffordshire Plc



# Modern Slavery and Human Trafficking Statement for Financial Year Ending March 2025

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# Contents

<b>Modern Slavery and Human Trafficking and Human Rights Statement</b>	3
<b>Our Structure</b>	3
<b>Reporting and Policies</b>	3
<b>Raising Concerns</b>	4
<b>Our Supply Chain</b>	4
<b>Our Employees</b>	4
<b>Focus Areas</b>	5
<b>Commitments for 2024/25</b>	5
<b>Board Approval</b>	6

## Modern Slavery and Human Trafficking Statement

This is a statement on behalf of South Staffordshire Plc's and its subsidiary companies' ("Group"). The following Group companies must publish modern slavery and human trafficking statements in accordance with 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.
- SSI Services (UK) Limited and its subsidiary companies: Integrated Water Services Limited (IWS) and Onsite Central Limited. 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. OnSite Central Limited delivers essential infrastructure maintenance and civil engineering services to essential operators and markets.  
(together the "Companies").

This statement is also made on behalf of those Companies as required by the Modern Slavery Act 2015.

Our zero-tolerance commitment to preventing slavery and human trafficking within all our business operations and supply chains is reflected in this statement.

## 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 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 Modern Slavery, Human Trafficking and Human Rights Policy 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 Modern Slavery, Human Trafficking and Human Rights Policy and our Sustainability Policies.

Issue no.	Ref number	Date	Review date	Author	Approved by
V3.0		17/09/25	01/09/27	Caroline Stretton	the Board



## South Staffordshire Plc

Our Business Ethics Policies are communicated to employees, suppliers, and contract workers. Specifically, our Supplier Code of Conduct policy 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.

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 and where applicable, criminal and financial checks are also performed. More thorough checks are conducted for staff in roles with critical operational responsibilities.

We verify identity and right to work in the UK in accordance with the Immigration, Asylum and Nationality Act 2006 for new employees, as well as agency, subcontract and self-employed personnel. We also conduct periodic

Issue no.	Ref number	Date	Review date	Author	Approved by
V3.0		17/09/25	01/09/27	Caroline Stretton	the Board



## South Staffordshire Plc

right to work reviews as appropriate. Records are retained in line with our retention policy.

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 and have built on those during the year focusing on the following areas:

- Managerial Awareness: Training has been completed for all our managers on Right to Work in the UK to ensure they understand their responsibilities and can fully comply with our internal processes. This has been supported by a robust audit of every employee's Right to Work in the UK documentation.
- Off Payroll Workers: A new process for Off Payroll Workers has been implemented which ensures that all agency, subcontract and self-employed personnel complete appropriate checks prior to commencing a period of work and that any third parties have signed and agreed terms and conditions.
- ManagerHub: A centralised toolkit for managers has been launched, completed by a monthly newsletter. This provides an important mechanism to update and support managers with key people processes.
- ESG Strategies: Our approach to Modern Slavery, Human Trafficking and Human Rights have been aligned with our wider ESG strategies.
- Employee Training: Awareness training continues to be implemented for employees, focusing on identifying and responding to signs of modern slavery, with an emphasis on supply chain management and procurement practices.
- Whistleblowing and Reporting: The Group encourages 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 2025/26

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

- **Visibility of Policies:** A new intranet will be created to provide comprehensive and centralised place for all Company policies
- **Onboarding:** A new onboarding portal will be launched to collate new starter documentation prior to commencement of employment and provide visibility of Company policies. This includes a revised standard contract template to ensure there is consistency across the Group
- **Identity Bank Verification:** New functionality in our HR System will enable us to verify bank details against the individual employee, which is an important step in detecting and disrupting modern slavery at its

Issue no.	Ref number	Date	Review date	Author	Approved by
V3.0		17/09/25	01/09/27	Caroline Stretton	the Board



South Staffordshire Plc

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## Board Approval

This statement constitutes South Staffordshire Plc and its subsidiary companies "Modern Slavery, Human Trafficking and Human Rights Statement for the financial year ending 31 March 2025 and was approved by the South Staffordshire Plc Board of Directors on [ ] September 2025.



Charley Maher  
Group CEO  
for and on behalf of the Board

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