



## Integrated Water Services Limited Modern Slavery & Human Trafficking Statement

### **OUR BUSINESS**

Integrated Water Services Limited (“**Integrated Water Services**”) is part of SSI Services (UK) Limited, a division of South Staffordshire Plc.

Integrated Water Services consists of two divisions:

- (i) the Water Hygiene division provides services in all aspects of water hygiene and legionella control including legionella risk assessments into the public sector, utility companies, industrial, commercial and retail customers; and
- (ii) the Mechanical and Electrical Engineering division includes pump diagnostics and refurbishment, project management, telemetry, chemical dosing and control, instrumentation installation and maintenance, environmental management, plan and infrastructure maintenance and emergency response

### **Parent Company**

Integrated Water Services’ parent company is SSI Services (UK) Ltd (“**SSI Services**”).

SSI Services’ ultimate parent company is South Staffordshire Plc.

South Staffordshire Plc and SSI Services both fully supports Integrated Water Services Modern Slavery statement. South Staffordshire Plc has published a voluntary statement which can be found at <http://www.south-staffordshire.com/downloads/DOC180419-18042019115319.pdf> and SSI Services has published a statement which can be found at <https://www.ssi-services.co.uk/wp-content/uploads/SSI-Modern-Slavery-Statement.pdf>

### **STATEMENT**

This statement is made by Integrated Water Services in accordance with the Modern Slavery Act 2015 (“**Act**”).

Integrated Water Services does not tolerate any form of modern slavery or human trafficking and we are completely committed to preventing slavery and human trafficking within the company including our supply chains. We act ethically and with integrity in our business relationships and adopt responsible business practices.

## **OUR POLICIES**

Our Modern Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our Anti-bribery and Whistleblowing Policies also support our Modern Slavery, and Human Trafficking Child Labour Policy.

Integrated Water Services is required to comply with these policies.

## **GOVERNANCE**

This year we established an internal Modern Slavery Committee which is represented by our key Human Resources and Business/Supply Procurement employees and senior managers. The purpose of the Modern Slavery Committee is to drive our actions to identify and mitigate the risk of modern slavery arising within our Group and supply chain.

## **SUPPLY CHAIN**

The supply chains within Integrated Water Services include suppliers, subcontractors and business partners of all sizes and types of supply, ranging from suppliers of services, goods and materials to suppliers.

Integrated Water Services expects, and endeavours to ensure, that organisations within its supply chains also have no tolerance to any form of modern slavery and human trafficking and the Company adopt responsible business practices in respect of reducing the risk of modern slavery and human trafficking.

Supplier reviews are carried out on most suppliers.

This year we have worked closely with a selection of our suppliers which we have deemed to be high risk to undertake audits of their compliance with, and the risks that they face from, modern slavery in their own organisation and supply chain. We have developed a 'Supplier Tracker' on which we have recorded the name of each supplier we have audited and when each audit was conducted during this last year.

## **EMPLOYEES**

Through our employment tracker we ensure that:

- All employees are subject to rigorous "right to work" checks.
- All employees are managed by another senior employee.
- All employees are inducted into the business.

This year we have amended our internal processes to safeguard the interests of our employees, especially where the employee is updating their bank account and reviewing those who update bank account name not bearing the employee's name.

## **EDUCATION/COMMUNICATION**

We continue to ensure all employees are briefed on Modern Slavery and Human Trafficking at induction and prior to induction via an information sheet.

All employees are encouraged to report any suspicious behaviour.

Managers are provided with a range of leadership training and are assisted by our HR Team in HR-related matters including recruitment, remuneration and employee wellbeing.

### **RISK ASSESSMENT & DUE DILIGENCE**

We continue to monitor suppliers we believe present high modern slavery risks in our supply chain and continue to focus on the following areas which pose the most significant risks:

- The behaviour of our supply chain.
- Employing an individual who may be subject to modern slavery and/or human trafficking.
- Education and communication to the current workforce.

We will take the following steps to reduce risks in these areas:

### **FORWARD ACTIONS**

<b>Risk</b>	<b>Area</b>	<b>Action</b>
1.	Supply Chain	<ul style="list-style-type: none"><li>• Continue working towards our aim to review the modern slavery compliance of all of our high risk suppliers.</li><li>• Carry on completing 3 “spot check” visits to be undertaken per year by Divisional Procurement Manager on our high risk suppliers.</li></ul>
2.	Employment Tracker	<ul style="list-style-type: none"><li>• Develop a more consistent approach within our recruitment process and create on-boarding platform.</li><li>• Continue to ensure 20% of all new employees will be reference checked</li></ul>
3.	Education / Communication	<ul style="list-style-type: none"><li>• Continue to roll out training to Senior Managers</li><li>• Maintain a focus on employee awareness by creating suitable promotional literature</li><li>• Publish a “report line” number for employees to call.</li><li>• Continued promotion of our whistleblowing process to ensure employees understand how they can raise any concerns they may have.</li></ul>

### **REPORTING CONCERNS**

Anyone that may have a concern about modern slavery or human trafficking within the Company 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 the Whistleblowing Policy. Matters can also be discussed informally with the Head of Legal Services.

## **CONTINUOUS IMPROVEMENT**

In the forthcoming year, as well as the specific actions referred to above, we will continue to focus on understanding the risk of modern slavery and human trafficking taking place within the Company and supply chains and to develop and/or strengthen policies and procedures as appropriate.

At Integrated Water Services, we believe that actions speak louder than words and we commit to the actions set out in this statement.

This statement constitutes Integrated Water Services Limited's modern slavery and human trafficking statement for the financial year ending 31 March 2019 and was approved by the board on 24 June 2020.



**Simon Dray**  
Integrated Water Services - Director



**Neil Shailer**  
Integrated Water Services - Director

24 June 2020