

Anti-Slavery & Human Trafficking Policy

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1. Introduction

- 1.1. Castle Water is a licensed provider of water and waste services throughout Scotland and England. Our customer base is diverse and ranges from large to small businesses.
- 1.2. Castle Water values trust, dedication and accountability as part of our ethical practice policy. We are committed to managing our business in a responsible manner and understand our corporate social responsibility.
- 1.3. Castle Water maintains relationships with many different organisations in its supply chain and is committed to ensuring that services and supplies are procured with integrity and in an ethical manner.
- 1.4. Castle Water recognises the importance of transparency in supply chains and is committed to continuously improving visibility of our supply chain, including mapping direct suppliers, and this year is taking steps to begin mapping indirect suppliers. This helps us identify potential risk areas and strengthen control in accordance with the guidance around modern slavery.

2. What is Slavery?

- 2.1. Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part.
- 2.2. The Modern Slavery Act 2015 (the “MSA”) recognises the important part businesses can play in tackling slavery and encourages them to do more.
- 2.3. The MSA covers four activities:

Slavery	Exercising powers of ownership over a person.
Servitude	The obligation to provide services is imposed by the use of coercion.
Forced or Compulsory Labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
Human Trafficking	Arranging or facilitating the travel of another person with a view to their exploitation.

- 2.4. This policy covers all four activities.

Our Statement & Responsibilities

3. Anti-Slavery Statement

- 3.1. Castle Water has a zero-tolerance approach to modern slavery within our business and supply chains.
- 3.2. We are committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain. We also make sure that our suppliers are aware of our policies and adhere to the same high standards throughout the course of their business.
- 3.3. We are committed to acting ethically and with integrity in all our business dealings and relationships. We seek to implement, enforce and maintain effective systems and controls to ensure modern slavery is not taking place in our own business or in our supply chains.
- 3.4. We make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and customers seriously.
- 3.5. We make this statement as part of our company reporting. This can also be found on our website at www.castlewater.co.uk.

4. Responsibilities:

- 4.1. Castle Water, our directors, managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.
- 4.2. This policy applies to all persons working for Castle Water or on our behalf in any capacity, including but not limited to employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 4.3. This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 4.4. Castle Water will:
 - 4.4.1. maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
 - 4.4.2. be clear about our recruitment policy;
 - 4.4.3. check our supply chains;
 - 4.4.4. lead by example by making appropriate checks on all employees, recruitment agencies, suppliers etc to ensure we know who is working for us;
 - 4.4.5. ensure we have in place an open and transparent grievance process for all staff;

- 4.4.6. seek to raise awareness so that our colleagues know what we are doing to promote their welfare.
- 4.4.7. communicate our anti-slavery expectations clearly to all supplier and business partner relationships, including a requirement to adhere to our policy and undertake appropriate due diligence on their own operations and supply chains.
- 4.4.8. make a clear annual statement setting out the steps we have taken to ensure slavery and trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our customers seriously.

4.5. Our directors and managers will:

- 4.5.1. listen and be approachable to colleagues;
- 4.5.2. respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation.
- 4.5.3. remain alert to indicators of slavery;
- 4.5.4. raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do;
- 4.5.5. use their experience and professional judgement to gauge situations.

4.6. Our employees:

- 4.6.1. We all have responsibilities under this policy. Whatever your role or level of seniority, you must:
 - (i) Keep your eyes and ears open – if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, report this to your line manager and the HR department immediately;
 - (ii) Follow Castle Water's reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated in any way;
 - (iii) Tell us if you think there is more that we can do to prevent people from being exploited.

Our Procedures

5. Risk and Compliance

- 5.1. Castle Water regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by conducting risk management activities such as internal and external audits and following the appropriate due diligence and supplier procurement procedures which we have in place.
- 5.2. We do not consider that we operate in a high-risk sector or location. With this in mind, we still need to pay particularly close attention to the following, including but not limited to:
 - 5.2.1. our supply chain;
 - 5.2.2. any outsourced activities, particularly to jurisdictions that may not have adequate safeguards;
 - 5.2.3. cleaning suppliers;
 - 5.2.4. information technology suppliers; and
 - 5.2.5. any other relevant business partners, contractors and third parties who we may have dealing with from time to time.
 - 5.2.6. reviewing gaps in our visibility across lower-tier suppliers and taking steps to close them;
 - 5.2.7. prioritising action in sectors or jurisdictions with higher slavery risk based on global indices and evidence:
- 5.3. Where we have identified a potential risk, we take appropriate actions to determine, mitigate and remedy that risk through internal activities such as due diligence and improved procurement practices.

6. Due Diligence

- 6.1. As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have an established risk management framework which is designed to:
 - 6.1.1. establish and assess areas of potential risk in our business and supply chains;
 - 6.1.2. monitor potential risk areas in our business and supply chains.
 - 6.1.3. Identify any appropriate risks in our business and supply chains, including slavery and human trafficking, and ensure these are appropriately mitigated.
 - 6.1.4. provide adequate protection for whistle-blowers.

7. Supply Chains:

- 7.1. We thoroughly check supply chains to ensure the potential for slavery or human trafficking is significantly reduced.
- 7.2. Castle Water aims to ensure all supplier agreements must include explicit modern slavery clauses requiring adherence to Castle Water's anti-slavery standards and the undertaking of internal controls, training and transparency measures.

- 7.3. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains.
- 7.4. We aim to ensure that our supplier contract contains an anti-slavery clause. This clause prohibits suppliers and their employees from engaging in slavery or human trafficking.
- 7.5. We ensure we can account for each step of our supply processes; we know who is providing goods and services to us and we have mechanisms and processes in place to check this:
 - 7.5.1. Supplier mapping;
 - 7.5.2. Risk assessing suppliers;
 - 7.5.3. Auditing suppliers.

8. Agency Recruitment

- 8.1. Our Human Resources Department follows Castle Water policy and only uses agreed, specified and reputable recruitment agencies.
- 8.2. To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:
 - 8.2.1. Conducting background checks;
 - 8.2.2. Investigating reputation;
 - 8.2.3. Ensuring the staff an agency provides has the appropriate paperwork (e.g. work visas); and
 - 8.2.4. Ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying.
- 8.3. We keep agents on the list under regular review, at least every 3 years.

9. General Recruitment

- 9.1. We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- 9.2. We always ensure staff are legally able to work in the UK.
- 9.3. We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
- 9.4. We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- 9.5. If through our recruitment process, we suspect someone is being exploited, the Human Resources Department will follow the appropriate reporting procedures.

Identifying & Reporting

10. Identifying slavery

- 10.1. There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.
- 10.2. However, the following key signs could indicate that someone may be a slavery or trafficking victim:
 - 10.2.1. The person is not in possession of their own passport, identification or travel documents.
 - 10.2.2. The person is acting as though they are being instructed or coached by someone else.
 - 10.2.3. They allow others to speak for them when spoken to directly.
 - 10.2.4. They are dropped off and collected from work.
 - 10.2.5. The person is withdrawn, or they appear frightened.
 - 10.2.6. The person does not seem to be able to contact friends or family freely.
 - 10.2.7. The person has limited social interaction or contact with people outside their immediate environment.
- 10.3. This list is not exhaustive.
- 10.4. Remember, a person may display a number of the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.
- 10.5. If you have a suspicion, report it.

11. Reporting Slavery

- 11.1. Talking to someone about your concerns may stop someone else from being exploited or abused.
- 11.2. If you think that someone is in immediate danger, dial 999.
- 11.3. Otherwise, you should discuss your concerns with the Human Resources Department who will decide on a course of action and provide any further advice.
- 11.4. Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with the Human Resources Department before taking any further action.

Compliance, Training & Monitoring

12. Compliance

- 12.1. You must ensure that you read, understand and comply with this policy.
- 12.2. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 12.3. You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 12.4. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 12.5. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager as soon as possible. You should note, when we deem appropriate, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.
- 12.6. If you are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager.
- 12.7. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not resolved, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the Employee Handbook on the Castle Water Intranet.

13. Training

- 13.1. We provide specialist training to those staff members who are involved in management recruitment and supplier procurement.
- 13.2. We provide training on this policy for all new members of staff as part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 13.3. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

14. Breaches of this policy

- 14.1. Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 14.2. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

15. Monitoring

- 15.1. We will review our anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes that we make.