



Portsmouth Water Limited

Modern Slavery Policy

Anti-Slavery and Human Trafficking Policy

1. Policy Statement

Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are also committed to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our own business and in those that supply goods and services to us.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling slavery which is consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

2. Responsibility for the Policy

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Purchasing Manager has primary and day-to-day responsibility for implementing this policy within our supply chain, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering slavery.

The Head of Human Resources has primary and day to day responsibility for ensuring that we do not employ individuals who have arrived at our workplace as a result of human trafficking.

Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of slavery in the workplace.

3. Compliance with the Policy

The prevention, detection and reporting of slavery in any part of our business is the responsibility of all those working for us or under our control. As a result all must:

- Ensure that they read, understand and comply with this policy.
- Avoid any activity that might lead to, or suggest, a breach of this policy.
- Notify their Manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- Raise concerns about any issue or suspicion of slavery in any parts of our business at the earliest possible stage.
- If anyone believes or suspects a breach of this policy has occurred or that it may occur they must notify their Manager or report it in accordance with our Public Interest Disclosure Policy as soon as possible.

- If they are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any of our subsidiaries' constitutes any of the various forms of modern slavery, raise it with their Manager.

In line with our Public Interest Disclosure Policy, we 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 slavery of whatever form is or may be taking place. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If anyone believes that they have suffered any such treatment, they should inform the Head of Human Resources immediately. If the matter is not remedied, and was raised by an employee, it should be raised formally using our Grievance Procedure.

4. Communication and awareness of this policy

Training on this policy, and on the risk our business faces from slavery, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to 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.

5. Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.