



Modern Slavery & Human Trafficking Policy

Purpose

This policy sets out Safestream Water and Air Ltd's commitment to preventing modern slavery and human trafficking in our business and supply chains, and explains the steps we take to identify, prevent and address those risks.

Scope

This policy applies to all employees, directors, officers, contractors, consultants, temporary workers, volunteers, suppliers and other third parties acting on behalf of Safestream Water and Air Ltd in any country.

1. Policy statement

Safestream Water and Air Ltd has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

2. Definitions

- Modern slavery — slavery, servitude, forced or compulsory labour, and human trafficking for any purpose (including sexual exploitation, forced labour, debt bondage and the worst forms of child labour).
- Supply chain — any supplier, sub-contractor, agent or partner that provides goods or services to Safestream Water and Air Ltd.

3. Legal framework & responsibilities

This policy supports compliance with applicable laws and international standards (including the UK Modern Slavery Act 2015 and ILO conventions where applicable).

Ultimate responsibility for the policy and its implementation rests with the Board of Directors. Day-to-day responsibility for operational implementation is delegated to the Head of Compliance / Head of Procurement (or named officer).

Responsibilities include:

- Conducting risk assessments and due diligence.
- Maintaining contractual controls with suppliers.
- Delivering training and awareness.
- Providing secure channels for reporting concerns.
- Monitoring and reviewing the policy's effectiveness.

4. Risk assessment & due diligence

We will take a risk-based approach to identify, assess and prioritise the areas most at risk of modern slavery, considering factors such as geography, sector, labour intensity, and supplier tier.

Due diligence measures include (proportionate to risk):

- Supplier risk profiling (country, industry, size, past incidents).
- Contractual clauses requiring compliance with modern slavery laws and the right to audit.
- Pre-qualification questionnaires (including questions on labour practices).
- Site visits or independent audits for higher-risk suppliers.
- Requiring remediation plans where issues are identified, and escalation (including termination) if remediation is refused or insufficient.

5. Procurement & supplier management

- Modern slavery expectations will be included in our Procurement Policy and standard supplier contracts.
- We will seek commitments from suppliers to maintain appropriate policies, worker protections and record keeping.
- We will reserve the right to audit suppliers and require corrective actions where necessary.

6. Recruitment, employment practices & worker welfare

- We will only engage workers through reputable recruitment agencies that comply with labour laws and do not charge recruitment fees to workers.
- We will ensure employment contracts are clear, that wages meet legal minimums, working hours comply with law, and that workers keep access to identity documents.
- We will provide confidential channels for workers to raise grievances without fear of retaliation.

7. Training & communication

- We will provide training to relevant staff (procurement, HR, managers) so they can recognise and respond to risks.
- We will communicate this policy to suppliers, business partners and contractors, and encourage them to adopt similar standards.

8. Reporting concerns & whistleblowing

Any employee or third party who suspects modern slavery or human trafficking is occurring in our business or supply chain must report it via George@safestreamuk.com or contact a line manager or the Head of Compliance.

Reports will be treated seriously, investigated promptly, and handled confidentially. We will protect whistleblowers from retaliation in accordance with our Whistleblowing Policy.

9. Remediation & corrective action

Where modern slavery is found or reasonably suspected:

- We will promptly assess the situation and take appropriate action to protect victims (which may include safe housing, medical care, legal support and cooperating with authorities).
- We will require suppliers to remediate and, if necessary, terminate relationships where suppliers fail to remedy.
- We will document actions taken and lessons learned.

10. Monitoring, performance indicators & review

We will monitor the effectiveness of our approach using proportionate KPIs such as:

- Number of supplier risk assessments completed.
- Percentage of high-risk suppliers with remediation plans or audits.
- Number of modern slavery incidents reported and resolved.
- Number of staff and supplier training sessions completed.

This policy and our approach will be reviewed at least annually and updated where appropriate.

11. Board approval

This policy was approved by the Board of Directors of Safestream Water and Air Ltd on 30/08/2025. It is owned by the Directors and will be reviewed annually.

12. Contact

Questions about this policy or to report concerns should be sent to:

George Taylor - Director
George@safestreamuk.com | 07503172948

Appendix A — Sample supplier clause (short)

Supplier warrants and represents that: (a) it, its agents and subcontractors comply with all applicable anti-slavery and human trafficking laws; (b) it does not use forced, compulsory or trafficked labour and will not employ child labour; (c) it will allow Safestream Water and Air Ltd the right to audit and inspect relevant records and premises on reasonable notice; and (d) it will promptly notify Safestream Water and Air Ltd if it becomes aware of any breach and implement corrective actions.

Appendix B — Quick due diligence checklist (for procurement)

- Has the supplier completed an anti-modern slavery questionnaire?
- Country of origin/manufacture: are there high-risk jurisdictions?
- Does the supplier use third-party labour providers/recruitment agents? Are fees charged to workers?
- Are identity documents retained by employer?
- Evidence of worker contracts, pay slips and working hours.
- Any prior incidents, sanctions or media reports?
- Is supplier willing to accept audit and corrective action?

Appendix C — Short example modern slavery statement paragraph (for publishing)

Safestream Water and Air Ltd is committed to preventing modern slavery and human trafficking in all our operations and supply chains. We operate a zero-tolerance approach and expect the same from our suppliers and business partners. We conduct risk assessments, supplier due diligence and provide training to relevant employees. This statement is approved by the Board of Directors.

George Taylor / David Whatmough
Directors
George@safestreamuk.com / Dave@Safestreamuk.com
30/08/2025

The image shows two handwritten signatures in black ink. The signature on the left is 'G Taylor' and the signature on the right is 'David Whatmough'.