




# Anti-Slavery and Human Trafficking Policy



Ref	Version	Policy Owner	Revised	Owner	Checked	Company Signatory
170012	3.1	HR	July 2023	S Williams (HR Director) 	S Cheetham (HRBP) 	S Williams (HR Director) 

---

## Our Statement:

Culligan, and its associated companies, (“the Company”, “we”) operate to a set of values which reflect how we behave.

With particular reference to the Modern Slavery Act 2015, we are committed to opposing modern slavery in all its forms and preventing it by whatever means we can.

We demand this of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is a zero tolerance approach.

The Company reserves the right to alter or refresh this policy or any of its terms at any time, in line with legislation updates.

This policy does not form part of your contract of employment.

---

## 1.0 Purpose of the Policy

The Company maintains relationships with many different organisations in its supply chain, as well as employing people directly. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chain.

The policy below underpins our approach and will be used to inform our Statement on Slavery and Human Trafficking.

The Company has adopted a statement on the prevention of modern slavery and human trafficking. The statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with the Company and/or any member of the Company, to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with our anti-slavery policy.

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or 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.

This document sets out the policy of the Company with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain.

This policy’s use of the term “modern slavery” has the meaning as given in the act.

As a Company, we have a zero-tolerance approach to modern slavery. 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 own businesses or those of our suppliers.

---

## **2.0 Steps for the Prevention of Modern Slavery**

- 2.1** We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 2.2** We expect the same high standards from all of our contractors, suppliers and other business partners, and we are always evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.
- 2.3** All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chain, we acknowledge that we do not control the conduct of individuals and organisations in our supply chain.

---

## **3.0 Responsibility for the Policy**

- 3.1** Ultimate responsibility for the prevention of modern slavery rests with the Company's Leadership Team. The Directors of the company have overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.
  - 3.2** However, Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate guidance on the issue of modern slavery.
  - 3.3** All team members "employees" have a duty of care to report any concerns regarding issues of modern slavery or human trafficking using the Company Whistleblowing policy, available from the Company intranet.
- 

## **4.0 Actions to report Modern Slavery or Human Trafficking**

- 4.1** The Company Whistleblowing policy is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by team members in this manner.

The Whistleblowing policy applies to team members and may be found as a separate policy available on the Company's intranet site and from HR. The nature of the complaint will determine the Company's next course of action.

---

## **5.0 Suspicious Activity**

The Company must be made aware immediately of any suspicious activity and reported to the HR Director. Team members or any other person wishing to raise a concern should call the Human Resources Department in any of the following circumstances.

- I. You suspect a person acting on behalf of the Company is seeking to exploit another in a way which could amount to modern slavery;
- II. You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- III. You have received an approach from a person acting on behalf of the Company, who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed.
- IV. You have information which leads to the rational conclusion that a person acting on behalf of the Company or a supplier is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

The source of reports will be kept Confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed on our behalf or in any element of our supply chain.

---

## **6.0 Direct Communication**

- 6.1 The Company encourages members of the public or people not employed by us to write, in confidence, to the HR Director, c/o Zip Water UK Ltd, Trafalgar House, Rushes Green, Dereham, Norfolk, NR19 1TE, to raise any concern, issue, or suspicion of modern slavery in any part of our business, or related supply chain.
- 

## **7.0 Safeguards**

- 7.1 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.
  - 7.2 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.
  - 7.3 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
  - 7.4 The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.
- 

## **8.0 Communication and awareness of this Policy**

- 8.1 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.
-