



**HWM**

## Modern Slavery Act Statement

HWM-Water supports the provisions set out in the Modern Slavery Act ("the Act") and, through our own Human Rights and Labour Conditions Policy, endorses the core requirements of the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, including the conventions relating to forced labour, child labour, non-discrimination, freedom of association and right to collective bargaining. We do not tolerate practices which contravene these international standards. Regulatory demands upon us vary considerably around the world, so HWM-Water establishes the core structure to ensure that it fully complies with legislative and regulatory requirements.

The Act requires organisations to publish a slavery and human trafficking statement on an annual basis where they have a turnover of over €36 million, carry on business in the UK and are supplying goods or services. This statement sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in our business nor our supply chains.

HWM-Water has a culture of openness, integrity and accountability. We require our employees to act fairly in their dealings with fellow employees, customers, suppliers and business partners.

We do not believe that we operate in any high-risk industries and, based on the Global Slavery Index 2016, we do not have business operations in the highest risk countries.

Our worldwide Code of Conduct sets out the ethical standards that should govern the activities of HWM-Water and its subsidiaries, and the activities of our employees and business partners. Our policies and procedures specifically reference modern slavery and human trafficking. The Halma Code of Conduct requires that all HWM senior management, externally facing personnel and those involved in supply chain have undertaken Halma's Modern Slavery Act compliance training and are fully aware of the risks, indicators, and signs of Modern Slavery. New employees sign the Halma Code of Conduct, confirming their understanding and commitment to the policy. We are refreshing our internal training schedule in the coming year to expand our internal education on risk awareness and identification of non-compliance.

The use of temporary and agency workers is limited and is less than 10% of the total workforce in the UK headquarters, however we contract through a large and reputable employment agency that fully recognises and adheres to the provisions of the Act and ensures compliance with its strict policies and training program through the ISO accreditation.



The Group has a clear whistleblowing policy and an established third-party whistleblowing hotline which allows employees in any of our businesses to raise concerns confidentially, anonymously (where permitted by law) and independent of their company.

We regularly undertake audits of our major suppliers. Prior to engaging with major suppliers, due diligence and vetting procedures are in place to ensure that suppliers will meet our required standards. Our Supplier Approval process requires new suppliers to complete a questionnaire supporting their adherence to the Modern Slavery Act and are challenged on their answers. Existing tier 1 suppliers are required to confirm ongoing monitoring and adherence to the Act. The process also assesses whether further investigation is required such as a site visit and audit prior to approval.

HWM is an Ecovadis Silver certified company; this accreditation encompasses the Modern Slavery act as part of the overriding ESG agenda.

We have not identified any violations during the year.

This statement was approved by the Board of HWM-Water Ltd and signed on its behalf by:

Signature: *Kelly Macfarlane*

Date: 12<sup>th</sup> April 2024

Position: **Managing Director**