

Scottish Water Business Stream Limited Slavery and Human Trafficking Statement

1. Introduction

Business Stream is committed to working in a responsible and sustainable way that serves the long-term interests of our customers, colleagues, suppliers, the communities we serve, and society more widely. We undertake to procure goods and services in a sustainable and ethical way in compliance with our values, public procurement law and policy, and the Modern Slavery Act 2015.

We are committed to sharing our values with our suppliers and potential suppliers and ensuring they understand how important these are to us as an organisation, and then monitoring their performance against them. This statement is designed to inform our customers, colleagues, business partners, suppliers and the general public about the steps Business Stream has taken, and is taking, to ensure that slavery and human trafficking are not present either in our business or in our supply chain.

Business Stream adopts a zero tolerance approach to modern slavery and human trafficking. We are committed to respecting human rights, including the rights of children. Our zero tolerance principles are built into our contracts and tenders and reflected in the conversations we have and the opportunities we promote with our suppliers, contractors and sub-contractors. We review our procurement processes regularly to ensure responsible and sustainable sourcing. We expect all those who work for and with us to adhere to our zero-tolerance approach to slavery and human trafficking.

Business Stream is committed to transparency in its supply chain and to protecting against the risk that internal procedures, processes and contracts make demands of suppliers, contractors and subcontractors that may lead them to violate human rights.

Since the Modern Slavery Act 2015 came into force we have:

- Sought external legal advice to ensure that we are taking the necessary steps to support compliance.
- Held discussions with our Procurement and People and Development teams to support compliance.
- Created an Anti-Slavery Policy, which has been approved by our Board of Directors.
- Assigned compliance roles and responsibilities within the business.
- Reviewed our existing suppliers' due diligence processes to support compliance with our Anti-Slavery Policy.
- Identified Key Performance Indicators to assess our progress against our stated objectives.
- Introduced a continuous improvement approach to enhance our understanding of our wider supply chain so we are better placed to identify any risks.
- Become an accredited Real Living Wage employer achieving accreditation in December 2017.

2. Our business

Business Stream is one of the largest B2B providers of water and waste water services in the UK, providing both licensed services (water and waste water retailing) and unlicensed services (value-added services) to non-household customers.

Further information about our business, organisational structure and supply chain can be found at:

<http://www.business-stream.co.uk>

3. Organisational policies

Business Stream has a number of policies in place to guard against the risks of slavery, human trafficking, forced and bonded labour and labour rights violations. These policies include:

- a. Anti-Slavery Policy
- b. Procurement Policy
- c. Recruitment Policy
- d. Induction Policy
- e. Whistleblowing Policy

Our Anti-Slavery Policy sets out our zero-tolerance approach to slavery and human trafficking and reinforces our commitment to acting in a transparent and ethical manner. It applies to all colleagues and external contractors working for or on our behalf.

The policy sets out particular roles and responsibilities within our business, identifies key risks and explains our risk management processes.

4. Supply chain due diligence

Business Stream's supply chain is designated by category and includes the following:

- Metering & Bill Production Services
- ICT Equipment & Services
- Marketing Services
- Facilities
- Corporate Services
- Business Solutions

In the financial year 2015/16, all Business Stream suppliers were issued with a letter requiring the completion of a statement confirming that they comply with the principles of the Modern Slavery Act 2015. The statement specifically requires confirmation that the supplier does not, or will not in the future, support or do business knowingly with any other party involved in any act of slavery or human trafficking as defined in the Modern Slavery Act 2015.

Each new supplier is required to confirm that they comply with the principles of the Modern Slavery Act 2015 and that they do not, or will not, support or do business knowingly with any other party involved in any act of slavery or human trafficking as defined in the Modern Slavery Act 2015, before Business Stream will undertake any business with them.

This process was implemented in 2016/17 and in 2017/18 we created a supplier database to start recording suppliers' compliance to the policy. All new contracts have specific obligations regarding adherence with the Modern Slavery Act and our own compliance policies.

In 2018/19 all suppliers were requested to re-confirm their compliance with the principles of the Modern Slavery Act 2015. In addition, we have also risk profiled each supplier. Due to the nature of the goods and services we procure there is deemed to be a low risk of Modern Slavery, however, we identified those suppliers that we deemed to be of medium risk and they were contacted and asked more probing questions regarding the measures they have in place. We have also conducted site audits on key suppliers to ensure these measures are being adhered to.

In 2019/20 we requested that all suppliers re-confirm their compliance with the principles of the Modern Slavery Act 2015, and we also contacted all suppliers who were in the medium risk category. Additional site audits were also undertaken for all our key suppliers.

In 2020/21 we reviewed our risk profile and assessed each supplier against those criteria before asking our suppliers to confirm their compliance with the principles of the Modern Slavery Act 2015. In 2020/21 due to the pandemic, we had limited numbers of new suppliers being introduced.

In 2021/22 as in previous years, we continue to review our risk profile by supplier and confirm their compliance with the principles of the Modern Slavery Act 2015. We reviewed our audit schedule for Suppliers in 2022/23 and initiated a project to audit supplier's measures and the arrangements they have in place in support of the Modern Slavery Act 2015. In addition, we also reviewed our questions and scoring for future planned tenders to gain a greater understanding of the potential supplier(s) prior to contract award.

In FY2022/23 we reviewed and updated our Anti-Slavery Policy and Procurement Policy. We also completed our annual process to confirm with our supply chain their compliance with the Modern Slavery Act. In addition, we created a Supplier Code of Conduct that brings together all of our asks of a supplier inclusive of Modern Slavery which we issued during FY2023/24.

In 2023/24 we continued to review the risk profile of our supply chain and asked suppliers to confirm their compliance in writing with the principles of the Modern Slavery Act 2015. Our suppliers responded positively to the Supplier Code of Conduct. We carried out an increased volume of audits on our supply chain. We ran numerous tenders where the supplier needed to demonstrate compliance to the Modern Slavery Act 2015 to be eligible to participate in the tender process. We provided supply chain managers with awareness training which featured both our Anti-Slavery Policy and Procurement Policy.

Future supply chain

Our procurement process form for re-tendering includes a dedicated section with additional questions in relation to slavery, human trafficking and transparency within our supply chain. Potential suppliers will now be required to demonstrate their ongoing commitment to guard against slavery and human trafficking in their extended supply chain for the duration of any signed Agreement.

5. Training

Business Stream's Anti-Slavery Policy is published on our company's intranet site. All colleagues are required to read and confirm their understanding of the content of the Anti-Slavery Policy. We provide further tailored training where it is necessary to do so (for example, where a policy breach has occurred).

6. Key Performance Indicators (KPIs)

Our procurement team ensures that the fundamental principles of Business Stream's Anti-Slavery policy and the Modern Slavery Act 2015 are a key part of current and future formal supplier reviews.

The procurement team continues to build transparent and open relationships with current and future suppliers to ensure that slavery and human trafficking is not occurring within their extended supply chain.

We use the following KPIs to measure how effective we have been in contributing to the elimination of slavery and human trafficking:

- Risk measurement across the supply chain
- Measure the number of suppliers confirmed compliant with Business Stream's policy against our annual spend with them
- Asking colleagues to confirm that they have read and understood our Anti-Slavery Policy
- Ensuring that policy breaches are reported internally within 3 business days of occurring
- Ensuring that policy breaches are assessed within a week of being reported and further investigations concluded as soon as possible thereafter.

7. Further steps

- Further enhance the dedicated section of our website containing details of, and links to, all of our policies. We have already added a link to our Anti-Slavery Statement on our home page.
- Continue to ensure that our Employee Assistance Programme and Whistleblowing Policy and confidential phone line are highlighted and easily accessible to all of our colleagues.
- Continue to enhance the procurement process with the following:
 - Further expand the quantity of supplier site visits where the risk is deemed medium to high. These visits will initially happen prior to contract award, but also periodically during the engagement.
 - Continue to request on an annual basis re-confirmation of a supplier's ongoing commitment to guard against slavery and human trafficking in their organisation and across their supply chain and, using a risk-based approach, undertake further investigation if required. Issue action plans for suppliers where development is required.
- Continue with awareness training across the organisation in 2024/25

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Business Stream's slavery and human trafficking statement for the financial year ending 31 March 2024.



Johanna Dow
Chief Executive
Scottish Water Business Stream Limited

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