

BUSINESS PERFORMANCE SYSTEM PROCEDURE			DOC REF:
			BPS 6-17
TITLE:	SLAVERY & HUMAN TRAFFICKING POLICY		
INITIATED BY:	TEL SULTAN MANAGING DIRECTOR	DATE:	01/10/2021
APPROVED BY:	TOM SHARD AREA OPERATIONS & UK HSE MANAGER	DATE:	01/10/2021
AUTHORISED BY:	JON WALLER OPERATIONS DIRECTOR	DATE:	01/10/2021
EFFECTIVE FROM:	01/10/2021	WITHDRAWN ON:	
ISSUED ON:	01/10/2021	REPLACED BY:	
SUPERSEDES NO:			

REVIEW PROCESS:			NEXT REVIEW DATE:	11/09/2024
ISSUE NO.	DATE OF REVIEW	CHANGES MADE Y/N	IF Y – PROVIDE DETAILS OF CHANGES MADE	REVIEWED BY
1.1	13/09/22	Yes	Declaration added	RJB
1.2	26/10/22	yes	document reviewed, signature updated	RJB
1.3	11/09/23	yes	Document reformatted and reviewed, signature updated	RJB
1.4	09/05/24	YES	Routine review, no significant changes, inserted table for declaration sign off at end of document	RJB

PURPOSE/OBJECTIVE:

The purpose of this policy document is to outline Aqua Operations Ltd policy in regards to Modern Slavery and Human Trafficking.

SCOPE OF THE POLICY:

This policy applies to Aqua Operations Limited and its subsidiaries.

EFFECTIVE DATE:

01/10/2021

REVISION NUMBER:

Revision 1.4

INTRODUCTION AND POLICY STATEMENT

The Modern Slavery Act 2015 (the “Act”) mandates that Aqua Operations Ltd prepares a Slavery and Human Trafficking Statement each financial year.

Modern Slavery and Human Trafficking in their various forms and guises are a crime in the UK and much of the world, and a violation of fundamental Human Rights.

Aqua Operations Ltd has a zero tolerance approach to Modern Slavery and Human Trafficking and are committed to acting ethically and with integrity in all activities and business relationships and we expect our Supply Chain, Contractors, Employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

RESPONSIBILITY FOR THE POLICY

The Directors and Senior Management Team of Aqua Operations Ltd have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf in any capacity comply with it.

The prevention, detection and reporting of Modern Slavery in any part of our business or Supply Chain is the responsibility of all persons working for us or on our behalf in any capacity (including our Employees, Suppliers, Workers, Directors, Agents and all Third Party Business Partners).

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of Modern Slavery in Supply Chains.

COMMITMENT

Aqua Operations Limited are implementing and enforcing a number of measures, policies and controls both internally and externally to ensure compliance with the requirements of the Modern Slavery Act 2015.

COMPLIANCE

All persons working for us or on our behalf in any capacity must:

- Read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy.
- Notify their immediate 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 Modern Slavery in any parts of our business or Supply Chains of any Supplier tier at the earliest possible stage.

BREACHES OF 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.

ONGOING REVIEW

Aqua Operations Limited will review both its external operations and its internal operations on an ongoing basis to check compliance with the above policy, and to check that our policy is being implemented effectively.



Signed:

Name: Jon Waller

Job Title: Director

Date: 11th September 2023

DECLARATION

I have been issued with a copy of the AOL Slavery & Human Trafficking Policy and agree to comply with the requirements at all times.

Signature	Name	Date

