



BUSINESS PERFORMANCE SYSTEM (BPS) PROCEDURE

Ref:			
Title:	Slavery & Human Trafficking Policy		
Issue No	1	Date Issued:	01/10/21

Owner:	Tel Sultan	Date:	01/10/21
Checked By:	Tom Shard	Date:	01/10/21
Authorised By:	Jon Waller	Date:	01/10/21

Review Date: 01/10/22

Review History

Issue No	Date of review	Changes made Y/N	If Y – provide details of changes made	Changed by
1	12/05/2022	Y	Signed and dated	RB

1.0 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 all 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 have 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.

2.0 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.

3.0 Commitment

- Aqua Operations Ltd 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:

4.0 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.

5.0 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 organization's working on our behalf if they breach this policy.

6.0 Ongoing Review

- Aqua Operations Ltd 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: 01 October 2021