

Document Title	Anti-Slavery & Human Trafficking Policy	
Document Number	Anti-Slavery & Human Trafficking Policy	
Revision No.	01	

1 Introduction

Modern slavery is a crime resulting in an abhorrent abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'.

Despite many organisations taking action to promote ethical business practices and policies that protect workers from being abused and exploited in their own organisation and global supply chains there are still far too many people in the world being treated as commodities. There are also far too many organisations ignoring such abuses or who are knowingly responsible for policies and practices that result in workers being subjected to modern slavery in their operations.

2 Statement

Organisation's Structure

Water Direct is the UK's leading alternative and emergency water supplier, providing wholesome, quality assured bulk water supplies nationwide. We are wholly owned subsidiary of FGS Utilities Ltd who are in turn wholly owned by FGS Agri Ltd (our ultimate parent company). FGS Agri Ltd has its head office in the United Kingdom. Water Direct Ltd employs approximately 40 members of staff and operates only in the United Kingdom. We have an annual turnover of £3,779,323.

Our Business

Our Business operates Nationwide from a number of depots throughout the United Kingdom, providing quality assured wholesome alternative water supplies in bottles, tanks and tankers and temporary infrastructure to create surrogate mains water supplies. Additional services include asset management, maintenance and deployment as well as contingency planning for business continuity. In addition to the operational team, there are also support / administrative functions.

Our Supply Chains

Our supply chains primarily include obtaining both bulk potable and bottled water as well as potable water containers (and associated pumps, pipework and fittings) from a number of parties. We also work with a number of contractors who supply haulage, storage, technical testing and analysis and other general business support services.

Our Policies on Slavery & Human Trafficking

Water Direct is committed to procuring its works, goods and services in an ethical and environmentally sustainable way and take our obligations under the Modern Slavery Act 2015 (the "Act") very seriously. We operate a zero-tolerance approach to any form of modern slavery and 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 business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, suppliers and other business partners and that our suppliers will hold their own suppliers to these same high standards.

Water Direct will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation's activities. This includes article 4 of the Universal Declaration of Human rights, which states "No one shall be held in slavery or servitude; Slavery and the slave trade shall be prohibited in all their forms".

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Communication & Awareness

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Due Diligence Processes

We have in place a policy to protect whistle blowers who highlight to us any risk of slavery or human trafficking within our business.

Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all employees. To ensure a high level of understanding of the risks of modern slavery

Document Title	Anti-Slavery & Human Trafficking Policy	
Document Number	Anti-Slavery & Human Trafficking Policy	
Revision No.	01	

and human trafficking in our supply chains and our business, we aim to develop and provide regular training for our staff.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30th April 2016.



Jonathan West, Managing Director