

Anti-Slavery and Human Trafficking Policy

SCP1.035.03

Policy

Servitech International is based in Wilstead, Bedfordshire, and is a leading independent provider of instrumentation support services for water, wastewater, and process industries.

The company's policy is that we are committed to ensuring transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes. We include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. See [Supplier Code of Conduct](#)

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and employees to strengthen their knowledge and skills specific for their work or for their career advancement 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 check and monitor our suppliers against compliance and ethics through our [Supplier list](#).

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

Compliance with the policy

All employees regardless of role must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify your manager or a director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

Employees are encouraged to 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.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our [Grievance Procedure](#) or [Whistleblowing Policy](#) as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or a director. We encourage you to utilise our open-door approach, or to use the channels suggested within this document.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is, or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Managing Director immediately.

If the matter is not remedied, and you are an employee, you should raise it formally using our [Grievance Procedure](#).

Breaches of this 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.

Legislation

Servitech is committed to complying with all legislation, regulations, and codes of practice relevant to our business.

Responsibility

The Senior Management has overall responsibility for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it.

The Managing Director is primarily responsible for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they effectively counter modern slavery. Where an identified case of child and/or forced labor is found, a Remediation plan will be put in place by the management team to support the victims affected.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Employees are invited to comment on this policy and suggest ways to improve it. Comments, suggestions and queries are encouraged and should be addressed via the [Complaints Procedure](#).

Measurement

The measurement of the success of this process will be via;

- The number of incidents reported through the whistleblowing policy
- The number of complaints recorded in relation to Anti-Slavery and Human Trafficking
- The number of grievances recorded via the Grievance Procedure due to concerns raised directly with this Policy.
- Any action brought to the company concerning this policy

General

This Anti-Slavery and Human Trafficking Policy will be considered as part of the auditing program.

Communications

This policy is communicated via Induction, company handbook and the company cloud data service.

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

Revision History

Date	Description	Version	Author
17/11/2022	Updated into word template for transfer into SharePoint from Google. Full Review applied for 2022	2.5	Bryony Roberts
1/12/2022	Approved	3	Duncan Ward

Management Control

Document Name:	Anti-Slavery and Human Trafficking Policy	
Version:	3	
Authored by:	Bryony Roberts	
Authorised by:	Duncan Ward	
Title:	Managing Director	
Signed:		
Date of Approval:	1st of December 2022	
Distributed to:	Internal	Induction, company handbook and the company cloud data service.
	External	On request by Stakeholders
Content Ownership:	Servitech International Limited	
Frequency of review:	Annually and/or to business needs whichever falls soonest.	