

# Modern Slavery and Human Trafficking Statement Waterlogic Group Holdings Limited

Waterlogic is committed to ensure that no slavery or human trafficking occurs within the Waterlogic Group or our supply chain. This statement is published in accordance with the Modern Slavery Act 2015 and it sets out the actions we have taken to consider all potential modern slavery and human trafficking risks related to our business.

#### 1. ORGANISATION'S STRUCTURE AND SUPPLY CHAIN

We are a global designer, manufacturer and distributor of mains attached point-of – use ("POU") drinking water purification and dispensing systems. We are the UK registered parent company of the Waterlogic Group of companies, with our global HQ based in Maidenhead UK, our manufacturing facility in Qingdao, China and with operations, offices and distributors worldwide

Our supply chains are predominantly focused on the supply of moulds, parts and components for the assembly of our POU systems, and mostly based on the Waterlogic IP and designs.

#### 2. APPLICABLE POLICIES AND PROCEDURES

The following policies indicate how we identify any modern slavery and human trafficking risks and describe our goals to ensure that these are prevented in our operations and supply chains

<u>Anti-slavery policy</u>: Our Anti-slavery Policy reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

<u>Whistleblowing policy</u>: We encourage all our staff to report any wrongdoing which extends to human rights violations like modern slavery and human trafficking. All reports are fully investigated and appropriate remedial action taken and our whistleblowing procedure is carefully designed to permit employees to make disclosures without fear of any retaliation.

<u>Code of Conduct</u>: Our Code of Conduct reflects our core beliefs and values in observing and demonstrating the highest standards of ethics and integrity and clearly sets out how Waterlogic does business and what is expected of our employees, business partners and suppliers.

Anti-bribery and corruption policy: Our anti – bribery policy makes it clear that we operate a "zero tolerance" policy towards fraudulent, dishonest or deceptive behaviour and condemns corruption in all its forms. We advise our employees to be aware of and report any concerns that they may have in this regard so that appropriate action can be taken. As part of supplying Waterlogic with any services/components, the owners and CEO's of the entire supply chain in China, and internationally, must sign the Waterlogic Ani-Bribery and Corruption contract. This contract remains in force for the entire supply contract period, and is controlled and monitored by our legal counsel in China, together with the Supply Chain Director. Any suspected cases of infringement are reported directly to our legal representation in China.

<u>Recruitment and employment</u>: We aim to ensure that we work only with reputable employment agencies and that all employees are paid via payroll systems duly regulated in the relevant territories.

#### 3. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we conducted during 2017, detailed audits of and within our key suppliers in all our major countries of operation, including in China. Our audit questionnaires covered key issues on applicable codes, practices and policies in place within our suppliers to identify and combat any risks of modern slavery and human trafficking. We plan to repeat this process at regular, meaningful intervals to maintain and improve open communications with our suppliers on this area of risk. We regularly undertake thorough due diligence when engaging new suppliers. Our critical and high value suppliers have been working with Waterlogic for over 15 years, in most cases, and new potential suppliers are vetted and audited by the Supply Team and Quality Team. Audit reports of potential suppliers and existing suppliers include not only technical and engineering observations, but also Corporate Responsibility of the supplier.

### 4. SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have a strong commitment to ensuring that our suppliers are aware of our high ethical standards and we update them on our applicable Code of Conduct and core requirements to be

observed, including healthy, safe and compliant working conditions for their employees. As part of the vetting and auditing process, potential and existing suppliers are made aware of our values and our requirement that they abide by these principles and values.

## 5. TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide appropriate training to our staff.

Date: 10 /04/2018

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Waterlogic Group's slavery and human trafficking statement for the financial year ending 2017.

SIGNATURE OF DIRECTOR:

WATERLOGIC GROUP HOLDING'S LIMITED

