



Modern Slavery Act Statement

Introduction

DelAgua Group of Companies (“The Company”) has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. Modern slavery is a crime and a violation of fundamental human rights. The Company recognises this 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.

The Company is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the UK Modern Slavery Act 2015. The Company expects the same standards and commitment from all of its suppliers, contractors and other third parties.

Our Core Values & ‘Ethics First’

One of our key mission statements is to adhere to a philosophy of “Ethics First” in everything we do. This steadfast commitment to 'Ethics First' provides the behavioural framework for our relationships with fellow employees, candidates, clients, shareholders and vendors. Honesty, integrity and professionalism are the core principles of our business. We expect our people to adhere to these standards in their daily actions and in line with our core values we are committed to improving our processes to help combat slavery and human trafficking.

Our Supply Chains

Our supply chains include, amongst others: large NGOs & educational establishments, Government Bodies, end users across 150 countries and professional services such as those provided by the Company’s external financial auditors and Solicitors.

Our Policies on Slavery & Human Trafficking

Our Policy sets out The Company’s position on modern slavery and reflects our commitment to acting in accordance with integrity in all our business relationships. We will review our systems and controls so that these remain effective in ensuring slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes for Slavery & Human Trafficking

We identify and assess the risk of potential slavery and human trafficking risk areas in our supply chains using a number of factors including the supplier’s geographical location and the industry in which they operate. As part of our initiative to identify and mitigate the potential risk we assess all existing and new suppliers and have in place a supply chain compliance programme, which consists of:



- Requiring all staff to comply with the applicable provisions relating to Modern Slavery and to avoid any activity that might lead to, or suggest, a breach of this policy.
- Requiring suppliers to agree to comply with the Modern Slavery Act and that they will adhere to the principles relating to Modern Slavery before they are approved and included in or allowed to continue to be included in, our supply chain.
- All new suppliers and current customers are required to agree to contractual obligations to avoid slavery and human trafficking and all existing contracts will include these contractual obligations at the next renewal or extension.
- Encouraging all staff and third parties to raise any concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage and to notify a manager, a senior point of contact and or the Legal Department.
- All managers who are responsible for procurement of goods and / or services must ensure that the Company's zero-tolerance approach to modern slavery is communicated to all third parties during the procurement process and / or at the outset of each business relationship.
- Protect staff from victimisation or retaliation if they raise concerns about slavery and human trafficking, even if raised in error.
- We will take any allegation of potential slavery and human trafficking seriously and we will investigate any allegation diligently.

Our Effectiveness in Combating Slavery & Human Trafficking

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, clients, candidates, members of the public, or law enforcement agencies to indicate that modern slavery practices have been identified.