

## Modern Slavery and Human Trafficking

The Freshwater Group is committed to complying with an Anti-Slavery and Human Trafficking policy and process. The Board of Directors and Senior management team is dedicated to combating modern slavery and is keen to demonstrate that they expect the same from our contractors, suppliers and business partners.

Before engaging with any customers, clients or suppliers, Freshwater employees must and will take reasonable steps to ensure due diligence and auditing is conducted to ensure any risks related to slavery and human trafficking is assessed. This may be in the form of discussion, through client contact documentation, through Service Level Agreements or through procurement documentation.

The roles within the Freshwater Group responsible for monitoring and implementing our commitment to, and in reporting modern slavery are:

- Managing Director
- Director of Finance
- Management Accountant
- Division Directors
- Account Directors
- Head of Human Resources

Specifically, the Head of Human Resources and Division Directors will be responsible for training and mentoring on Modern Slavery and new employees will be advised of Freshwater's commitment at induction.