

CLEAN CLEAR WATER (CCW) SLAVERY AND HUMAN TRAFFICKING STATEMENT 2019

INTRODUCTION FROM THE CHIEF EXECUTIVE

In line with our commitment to operate ethically and in compliance with all relevant laws and regulations, we are continuing to improve our practices to combat slavery and human trafficking in our supply chain by working with both our suppliers and employees. This statement describes the positive steps we take to ensure that slavery and human trafficking does not take place within our supply chain or any part of our business.

ORGANISATION'S STRUCTURE

CCW is an English manufacturer and installer of temporary and permanent hot and cold water solutions.

CCW has its head office in Warrington the UK. We operate in a geographical area that facilitates cost effective solutions to our clients: Cheshire Lancashire Merseyside and Gtr Manchester. Further details about CCW can be found at <http://www.cleanclearwater.co.uk/>.

OUR BUSINESS

CCW provides temporary and fixed water storage, pumping systems, and distribution to the construction and the event industry. For sale and hire, CCW manufacture pumping stations along with waste systems for site water along with modular catering and temporary mess kitchen modules for construction site use.

CCW offer a range of water related services including ACOP L8 Management and inspections, Landlord Supervision and consultancy, Installed system testing, tank inspection and repairs, System planned maintenance and chlorination.

OUR SUPPLY CHAINS

CCW purchase dept are responsible for sourcing and purchasing a wide range of materials. Materials include items such as steel, timber and chemicals for our manufacturing process and others such as electrical, ironmongery and insulation for our assembly of finished units.

The provision of contractor services for delivery and installation includes: plumbing, mechanical and electrical. As well as from time to time on site subcontractor services such as inspection, cleaning, and consultant support services.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

CCW are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This stance is in line with our Ethics policy.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we are continuing to implement measures to ensure that suppliers and subcontractors are engaged via a controlled process and are subject to approval by the central Procurement function before they contracted to supply materials or provide sub-contract services.

This engagement process clearly sets out the standards and expectations that we expect all of our supply chain partners to achieve with regards to slavery and human trafficking. Suppliers may be asked to sign a Supplier Code of Conduct.

We have processes that enable us to identify and mitigate any potential risks within the supply chain. These processes are under constant review for their effectiveness.

We have systems in place to protect whistle blowers. All matters of concern must be addressed to the company CEO and addressed as private and confidential.

SUPPLIER ADHERENCE TO OUR VALUES

CCW have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we may ask our suppliers and subcontractors to adhere to our Supplier Code of Conduct. All suppliers may be asked to return a written declaration to confirm their compliance with the Modern Slavery Act 2015.

In addition: CCW have recently undertaken a review of our contracting processes and are in the process of updating our contractual terms, which include a commitment to not use slave labour or participate in human trafficking.

TRAINING AND AWARENESS

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have made available to our employees an eLearning module to raise awareness of what Modern Slavery and Human Trafficking is and how each and every employee can seek to ensure that it does not take place in our business or our supply chain.

Communications have been made to all employees to provide a high level overview of the meaning of Modern Slavery and Human Trafficking and the zero tolerance stance of CCW in regard to this matter.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We have brought this statement to the attention of those in our procurement & purchasing functions and given the opportunity to provide feedback, to raise queries and to have them answered.

Our central procurement team are currently carrying out an assessment of the risk of non-compliance in our supply chain. They are also discussing with the Quality function how we can update and improve the supplier auditing process to ensure compliance to the standards agreed. We require our suppliers to adhere to our policies (including Business Ethics Policy, Anti-Bribery and Corruption Policy, and Equal Opportunity and Diversity Policy) and seek express acknowledgement of this through our Supplier Code of Conduct.

FURTHER STEPS

Further to a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking in our supply chains:

- Following on from work undertaken in 2018 around the improved Supplier Engagement process we intend to review and, to the extent necessary based on legal advice, update our contracting processes to ensure that our suppliers are bound to comply with our policy against slavery and human trafficking, and include the ability to terminate relationships for any non-compliance;

- Having developed a Supplier Code of Conduct which requires compliance from all of our suppliers our focus now switches to measuring the effectiveness;
- We will be refreshing and re communicating our Responsible Business Approach reemphasising a zero tolerance approach to slavery in our supply chain and our business as a whole;
- We will require appropriate employees to complete training to understand the risks of modern slavery and human trafficking;
- In 2019 we will launch a competency exercise which will provide clear direction of mandatory training within the business. This will include Modern Slavery awareness; and
- We will continue to communicate and cascade information on modern slavery across the business in order to raise awareness.

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 5th April 2019.

This statement was approved on 12 March 2019.

[Download Modern Slavery Statement](#)

M. Miller

**Chief Executive
Clean Clear Water**

A true certified copy of this document is available on request

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