



Modern Slavery Statement 2023

We are committed to preventing slavery and human trafficking in our supply chain and our corporate activities.

We pride ourselves in acting ethically and with integrity in all our business dealings and relationships and expect the same high standards from our contractors, suppliers, customers and other business partners.

Our Business

Highland Spring Limited is a privately owned bottled water business established in 1979, with 2 operational bottling plants, each with their own natural water sources, and provides employment to around 400 employees.

Responsibilities

The Managing Director is responsible for ensuring the statement is up to date and accurately reflects the Company's actions and initiatives to tackle slavery and human trafficking.

HR and all Functional Heads are responsible for introducing policies and reviewing the process by which they are adopted.

Our workers are encouraged to report any concerns they may have, and management are required to act upon them.

Due Diligence

We are committed to implementing and enforcing effective systems and controls to prevent the risk of slavery and human trafficking in our supply chains. Steps taken to date include:

- Membership of the Supplier Ethical Data Exchange (SEDEX), a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains.
- Working to maintain compliance with the Ethical Trading Initiative (ETI) Base Code of Conduct and undertaking regular SMETA audits across the relevant operational sites.
- Being a Corporate Partner of Scotland Against Modern Slavery.
- When recruiting, we adopt good practice approaches to checking right to work documentation. As standard, we require our agency providers to do likewise.
- Anti-slavery and human trafficking obligations are included as part of our standard raw material and packaging supplier contractual documents.
- Operating a formal supplier approval process across our packaging, raw materials and warehousing supplier base which incorporates:
 - monitoring SEDEX (or equivalent) membership status of our suppliers;

- understanding the ethical policy status of our suppliers; and
- as part of the continual review of our supplier approval process, SEDEX (or equivalent) membership is a requirement for all existing and new packaging, raw materials and warehousing suppliers.

Policies

The requirements of the Modern Slavery Act 2015 are reflected within our policies and procedures. We have developed a Modern Slavery and Human Trafficking Policy. We operate the following compliance policies: Anti-Bribery, Bullying and Harassment, Whistleblowing, Ethical and Child Labour Remediation.

We will implement additional policies and related measures where appropriate to support our commitment to preventing slavery and human trafficking in our supply chains.

Training and Awareness

We provide training regarding slavery and human trafficking for senior management, managers and all members of our Supply Chain, Procurement, Legal, Health & Safety and HR Teams to ensure they understand the risk and provide guidance on how to report and manage any concerns. Our Modern Slavery and Human Trafficking Policy is published on our employee intranet and we will ensure continuing employee awareness through appropriate communications

Performance Measures

Whilst we do not have any designated key performance indicators against slavery and human trafficking, our systems and controls regarding supplier screening and auditing allow us to periodically assess relevant policies are being adhered to. We will continue to monitor the effectiveness of our processes and take the necessary steps to improve, as appropriate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for the financial year ending 31 December 2023 of Highland Spring Limited.

The statement has been approved by the Managing Director and will be reviewed annually.

Signed by



Simon Oldham, Managing Director
HIGHLAND SPRING LIMITED

Date:

14th AUGUST 2024