Modern Slavery Statement 2025

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 490 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 Directors 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 SMETA audits across the relevant operational sites.
- Being a Corporate Partner of Scotland Against Modern Slavery.
- We adopt good practice approaches to checking right to work documentation of all new starts before they start by using a Home Office certified Digital Verification Service. As standard, we require our agency providers to do likewise and audit all agencies twice a year and randomly select agency worker files to check.
- 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.

Key Risk Areas

Our assessment of potential modern slavery risks takes account of recognised risks associated with the food and drink manufacturing sector and the nature of our operations and supply chain. Areas considered include the use of agency labour, raw material and packaging supply chains, and third-party warehousing and logistics arrangements.

We seek to manage any potential risks identified through the controls and processes outlined in this statement.

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, Sexual 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 all senior management, managers as well as members of our Supply Chain, Finance, Sales, Procurement, Legal, Health & Safety, Sustainability and HR Teams to ensure they understand the risks 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

We monitor the effectiveness of our approach through existing processes, including supplier approval and audit activity, training delivery and reporting mechanisms. These processes allow us to assess whether our policies and controls are being applied in practice. We intend to consider the development of appropriate indicators in future reporting periods.

Continuous Improvement

Good practice in preventing modern slavery and trafficking is an area that is constantly developing. During the next reporting period, we intend to review our approach in light of updated UK Government guidance, with a focus on enhancing our articulation of supply chain risk, reviewing relevant policies and considering how we monitor the effectiveness of our controls.

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 2025 of Highland Spring Limited.

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

Simon Oldham

Simon Oldham (Nov 16, 2026 11:25:08 GMT)

Signed by

Simon Oldham, Managing Director
HIGHLAND SPRING LIMITED

Date: 16/11/2026