

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement is a response to Section 54(1), Part 6 of the Modern Slavery Act 2015 and relates to actions and activities for the year ending 2022.

GWF Ltd is committed to preventing slavery and human trafficking violations in its own operations, its supply chain, and its products. We have zero-tolerance towards slavery and require our supply chain to comply with our values.

Organisational Structure

GWF Ltd has business operations in the United Kingdom. We operate in the Water Utilities sector. The nature of our supply chains is as follows: To supply water meters and their associated equipment.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner which are detailed in the GWF Code of Conduct. These include the following:

- Human Rights - Bribery & Corruption- Discrimination

Due Diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring in our supply chains, we have adopted the following due diligence procedures:

Our due diligence procedures aim to:

- Identify and action potential risks in our business and supply chains,
- Monitor potential risks in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.

Risk and compliance

The company has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK supply chain through:

We consider that we operate in a Low-risk environment because all relevant equipment is supplied from GWF the parent company who observe policies relating to human rights and anti-slavery.

We do not tolerate slavery and human trafficking in our supply chains. Where there is evidence of failure to comply with our policies and procedures by any of our suppliers, we will investigate and if proven, cease trading with the offending company.

Effectiveness

The Company uses Key Performance Indicators (KPIs) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chains. These KPIs are as follows:

- Require all relevant staff to have completed training on modern slavery
- Adherence and Acceptance of GWF Code of Conduct

The statement was approved by the board of directors.



Gary Vincent, Managing Director

15th December 2021