



STRAVICA

COMPANY POLICY | WATER HYGIENE & LEGIONELLA CONTROL

Modern Slavery & Human Trafficking Policy

Fair Work. Ethical Supply Chains. Zero Tolerance.



Document Control

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Revision History

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1.0	24 Oct 2026	Full rewrite to reflect Stravica Ltd's specialist focus on water hygiene and Legionella control and its prime contractor model. Adds a supply chain map and risk register for water hygiene services, delivery partner due diligence and contract controls, product supply chain risks (including disposable gloves, PPE and electronic monitoring equipment), guidance on recognising exploitation on client premises, Procurement Act 2023 and PPN 009 requirements, Scottish legislation, and complete appendices.	A. Olanrewaju, Director

Related Stravica Policies

This policy should be read alongside the Health & Safety Policy (STR-POL-HS-001), the Environmental Policy (STR-POL-ENV-001), the Equality & Diversity Policy, the Data Protection & GDPR Policy and the Anti-Bribery & Corruption Policy.

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1. Introduction And Purpose

1.1 About Stravica Ltd

Stravica Ltd is a UK prime contractor specialising in water hygiene and Legionella control. We deliver Legionella risk assessments, water hygiene monitoring, Legionella and water sampling, water tank cleaning and disinfection, water system remedial works and planned water hygiene maintenance to housing, healthcare, education, local authority, transport and commercial clients.

Stravica holds contractual accountability to each client and appoints vetted specialist delivery partners to carry out work on site. Our supply chain therefore consists mainly of skilled delivery partners and their workforces, accredited laboratories, and the suppliers of chemicals, consumables, personal protective equipment and monitoring equipment used in our services.

1.2 Purpose

This policy sets out Stravica Ltd's zero-tolerance approach to modern slavery and human trafficking. It establishes how we prevent, identify, respond to and report modern slavery in our own operations, in our supply chains and, where our people encounter it, on the client premises where we work.

1.3 Why This Matters In Water Hygiene

Water hygiene is a skilled, regulated trade, and the highest modern slavery risks in the UK lie elsewhere. However, a credible policy must address the real risks in our model rather than assume we are immune. The risks relevant to Stravica are:

- Labour supply beneath our delivery partners, particularly agency labour, labour-only subcontracting and self-employed operatives used for tank cleaning, remedial plumbing and surge work such as outbreak response.
- Product supply chains for disposable gloves, PPE, workwear, sample consumables and electronic monitoring equipment, some of which originate from sectors and regions where forced labour has been documented.
- Exposure to exploitation on client premises. Our operatives enter homes, lofts, plant rooms and communal areas across housing estates and may encounter signs of cuckooing, cannabis cultivation, overcrowded houses in multiple occupation or domestic servitude.
- Public sector requirements. Contracting authorities assess modern slavery risk in their supply chains, and serious failings can lead to exclusion from public procurement.

1.4 Objectives

- Ensure there is no modern slavery or human trafficking in Stravica's business or supply chains.
- Embed proportionate, risk-based due diligence in delivery partner selection, procurement and contract management.
- Ensure every person working on a Stravica contract is legally entitled to work, is paid fairly and works freely.
- Equip everyone working on Stravica contracts to recognise and safely report indicators of exploitation.
- Respond to concerns quickly, with the safety and dignity of potential victims as the first priority.
- Measure, report and continually improve the effectiveness of our approach.

2. Scope

2.1 Persons Covered

- Directors, employees, agency workers and consultants engaged by Stravica Ltd.
- Delivery partners, their employees, agency workers and any persons they engage on Stravica contracts, at every tier.
- Laboratories, suppliers, carriers and service providers in Stravica's supply chain.

2.2 Activities Covered

This policy applies to all Stravica activities, including bidding, contract management, procurement, and every water hygiene service delivered under Stravica contracts across England, Scotland and Wales. It also applies to how Stravica personnel and delivery partners respond to indicators of exploitation that they encounter on client premises.

2.3 Contractual Status

Compliance with this policy is a contractual requirement for every delivery partner and a condition of supply for every supplier. Requirements flow down to sub-tier suppliers and subcontractors.

3. Legal And Policy Framework

3.1 Legislation

Legislation	Relevance
Modern Slavery Act 2015	Creates offences of slavery, servitude, forced or compulsory labour (section 1) and human trafficking (section 2). Section 54 requires commercial organisations with turnover of £36 million or more to publish an annual transparency statement.
Human Trafficking and Exploitation (Scotland) Act 2015	Equivalent offences and victim support duties in Scotland, relevant to Stravica contracts in Scotland.
Procurement Act 2023	Modern slavery offences are mandatory exclusion grounds, and labour market misconduct is a discretionary exclusion ground. Suppliers can be added to the central debarment list.
Immigration, Asylum and Nationality Act 2006	Employers must carry out right to work checks. Civil penalties of up to £45,000 per illegal worker apply for a first breach, and up to £60,000 for repeat breaches.
National Minimum Wage Act 1998 and associated Regulations	Workers must receive at least the National Minimum Wage or National Living Wage.
Working Time Regulations 1998	Limits on working hours, rest breaks and paid annual leave.
Employment Agencies Act 1973 and Conduct of Employment Agencies and Employment Businesses Regulations 2003	Agencies may not charge work-seekers fees for finding them work.

Legislation	Relevance
Gangmasters (Licensing) Act 2004	Licensing of labour providers in regulated sectors. The Gangmasters and Labour Abuse Authority investigates labour exploitation across all sectors.
Human Rights Act 1998	Article 4 prohibits slavery and forced labour.
Public Interest Disclosure Act 1998	Protects workers who raise concerns about wrongdoing.
Care Act 2014 and Children Act 1989 and 2004 (and Scottish equivalents)	Safeguarding duties relevant when exploitation of adults at risk or children is suspected on client premises.
UK GDPR and Data Protection Act 2018	Lawful handling of personal and special category data about potential victims and concerns.

3.2 Government Policy And Guidance

- Procurement Policy Note 009: Tackling Modern Slavery in Government Supply Chains, which replaced PPN 02/23, and the accompanying Modern Slavery Assessment Tool.
- Home Office statutory guidance, Transparency in Supply Chains (section 54 of the Modern Slavery Act 2015).
- Home Office Modern Slavery Statutory Guidance for England and Wales, and equivalent Scottish guidance, on identifying victims and the National Referral Mechanism.
- UN Guiding Principles on Business and Human Rights and the ILO indicators of forced labour.

3.3 Section 54 Status

Stravica Ltd's turnover is currently below the £36 million threshold at which a section 54 statement becomes a legal requirement. As a public sector supplier, Stravica nevertheless commits to publishing a voluntary annual Modern Slavery Statement in line with the Home Office guidance, as set out in Section 19.

4. Definitions

Term	Meaning
Modern slavery	An umbrella term covering slavery, servitude, forced or compulsory labour, and human trafficking.
Slavery and servitude	Exercising ownership over a person, or an obligation to provide services imposed by coercion.
Forced or compulsory labour	Work or service exacted from a person under threat of a penalty and for which the person has not offered themselves voluntarily.
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation, whether or not the person consents.
Labour exploitation	Forcing people to work for little or no pay, often under threat, with wages withheld or controlled through debt.
Criminal exploitation	Forcing people to commit crimes, such as cannabis cultivation, drug dealing (including county lines) or theft.
Cuckooing	Criminals taking over the home of a vulnerable person to use it for drug dealing, storage or other criminal activity.

Term	Meaning
Domestic servitude	Forcing people to carry out household tasks in private homes, often with restricted freedom.
Debt bondage	Controlling a person through a debt, often for recruitment or travel, that they can never realistically repay.
National Referral Mechanism (NRM)	The UK framework for identifying potential victims of modern slavery and ensuring they receive support. Referrals are made by designated First Responder organisations.

5. Statement Of Intent

Stravica Ltd has zero tolerance of modern slavery and human trafficking in any form. We are committed to acting ethically and with integrity in all our business relationships, and to implementing effective systems and controls to ensure that modern slavery is not taking place anywhere in our business or our supply chains.

Stravica Ltd will:

- Assess modern slavery risk across our operations and supply chains, and focus due diligence where risk is greatest.
- Appoint only delivery partners and suppliers who demonstrate fair, lawful labour practices, and flow our standards down through their supply chains.
- Verify that every person working on a Stravica contract is a named, identified, legally entitled worker.
- Never tolerate recruitment fees charged to workers, withheld identity documents, withheld wages or debt bondage.
- Train our people and our delivery partners to recognise and report indicators of exploitation, including on client premises.
- Treat every concern seriously and respond with the safety of potential victims as our first priority.
- Protect anyone who raises a concern in good faith from any form of retaliation.
- Take decisive action, including termination of contracts and reporting to the authorities, where modern slavery is found.
- Report openly on our approach and its effectiveness.

Policy Approval

- Signed on behalf of Stravica Ltd by Adeola Olanrewaju, Director.
- Date of approval: 24 October 2026.
- This statement is issued to every delivery partner and supplier and published at www.stravica.uk.

6. Governance And Responsibilities

Role	Responsibilities
Director (Modern Slavery Lead)	Accountable for this policy and its implementation. Approves delivery partner appointments. Receives and coordinates the response to all concerns. Liaises with police, safeguarding authorities, First Responders, clients and regulators. Approves the annual Modern Slavery Statement. Leads the annual review.
Compliance & Procurement Administration	Carries out due diligence on delivery partners and suppliers. Maintains the supply chain risk register. Ensures contract clauses are in place. Collects annual attestations. Tracks training and KPI data.
Delivery Partner Contract Managers	Ensure their workforces and sub-tier suppliers comply with this policy. Provide named operative lists and right to work assurance. Report concerns to Stravica immediately. Cooperate with audits and investigations.
Delivery Partner Supervisors and Operatives	Complete awareness training. Recognise and report indicators of exploitation among co-workers and on client premises. Never investigate or intervene in a way that puts themselves or others at risk.
Suppliers and Laboratories	Comply with this policy and the Supplier Standards in Section 9. Provide information on request. Notify Stravica of any concern within 24 hours.
All Persons	Read and comply with this policy. Report concerns. Cooperate with investigations.

6.1 Prime Contractor Accountability

Stravica remains accountable to its clients for modern slavery risk across the whole supply chain on its contracts, including at tiers below the delivery partner. Appointing a delivery partner does not transfer this responsibility.

7. Our Supply Chain

Understanding our supply chain is the foundation of effective due diligence. Stravica's supply chain for water hygiene contracts is summarised below.

Tier	Category	Description
Tier 1	Specialist water hygiene delivery partners	UK companies employing qualified water hygiene operatives, risk assessors and engineers. Members of the Legionella Control Association.
Tier 1	UKAS-accredited laboratories	UK laboratories analysing water samples for Legionella and other parameters.
Tier 1 and 2	Labour providers	Employment agencies or labour-only subcontractors used by delivery partners for surge, specialist trades or remedial works.
Tier 2	Chemicals	Disinfectants, neutralising agents and descalers, mostly manufactured or blended in the UK and Europe.
Tier 2 and beyond	PPE and consumables	Disposable nitrile gloves, respirators, coveralls, workwear and sample containers, often manufactured overseas.

Tier	Category	Description
Tier 2 and beyond	Monitoring equipment and electronics	Thermometers, temperature probes, data loggers, wireless sensors and test kits, often with complex global component supply chains.
Tier 2 and beyond	Materials and fittings	Copper and plastic pipework, valves, thermostatic mixing valves and water tanks used in remedial works.
Tier 2	Services	Couriers, waste carriers, vehicle services and IT and software providers.

8. Risk Assessment

8.1 Methodology

Stravica assesses modern slavery risk for each supply category and each delivery partner, taking account of sector risk, geographic risk, the type of labour involved and the visibility Stravica has over the supply chain. Each category is rated high, medium or low, and the depth of due diligence is matched to the rating. The assessment is reviewed annually and whenever a new delivery partner, product category or service is introduced.

8.2 Risk Factors In Water Hygiene Delivery

Risk Factor	Why It Matters	Control
Agency labour and labour-only subcontracting	Reduces visibility of who is working, how they were recruited and how they are paid	Named operative lists; right to work assurance; agency due diligence; no unknown workers on site
Self-employed operatives	Bogus self-employment can hide below-minimum pay and control	Delivery partners confirm employment status and that pay meets legal minimums
Surge mobilisation (outbreaks, emergency disinfection)	Time pressure increases the temptation to use unvetted labour	Only pre-approved delivery partners and named operatives, even in emergencies
Out-of-hours and remote work	Less oversight of workers	Supervisor checks; lone worker procedures; worker voice routes
Tied accommodation or transport	Classic control mechanisms	Delivery partners disclose any accommodation or transport provided; audited
Low-cost consumables from high-risk regions	Forced labour documented in some glove, PPE and textile manufacturing	Supplier due diligence; preference for audited supply chains (Section 11)
Access to vulnerable people's homes	Operatives may encounter exploitation of residents	Awareness training and safe reporting (Section 12)

9. Delivery Partner And Supplier Due Diligence

9.1 Pre-Appointment Due Diligence

Before appointment, every delivery partner completes Stravica's modern slavery due diligence questionnaire (Appendix C) and provides supporting evidence. Due diligence covers:

- Corporate identity, ownership and beneficial owners, checked against Companies House.
- Sanctions screening, adverse media and any history of labour exploitation, investigations or convictions, and any entry on the Procurement Act 2023 debarment list.
- Modern slavery, whistleblowing and recruitment policies.
- Recruitment practices, including confirmation that no recruitment fees are charged to workers.
- Right to work checking procedures.
- Pay practices, including confirmation of at least National Minimum Wage or National Living Wage, payment direct to workers' own bank accounts, and lawful deductions only.
- Use of agencies, labour providers and subcontractors, and how they are vetted.
- Any accommodation or transport provided to workers.
- Grievance and worker voice mechanisms.
- Their own supplier due diligence for PPE and consumables.

9.2 Supplier Standards

All suppliers and delivery partners must meet these minimum standards:

1. Employment is freely chosen. There is no forced, bonded or involuntary prison labour.
2. Workers are not required to pay recruitment fees or lodge deposits.
3. Identity documents, passports and bank cards are never retained.
4. Wages are paid in full, on time, directly to the worker, at no less than the legal minimum, with clear payslips.
5. Working hours comply with the Working Time Regulations, and overtime is voluntary.
6. Workers are free to leave employment on reasonable notice.
7. Workers have access to confidential grievance routes without fear of retaliation.
8. Standards are flowed down to the supplier's own suppliers and subcontractors.

9.3 Ongoing Monitoring

Control	Frequency
Named operative list checked against operatives attending site	Every visit (through ID badge checks and job records)
Annual modern slavery attestation from each delivery partner	Annually
Stravica site audit including confidential operative conversations	At least quarterly per contract
Review of delivery partner use of agencies and subcontractors	At contract review meetings
Repeat sanctions and adverse media screening	Annually
Deeper review of high-risk product suppliers	Annually

10. Workforce And Labour Standards

10.1 Stravica's Own Workforce

- Right to work checks are completed before anyone starts work, using Home Office-compliant methods.
- Every worker receives written terms in a language they understand.
- Pay is at or above the National Living Wage, paid directly to the worker's own bank account.
- No recruitment fees are charged and no identity documents are retained.
- Agencies used by Stravica are vetted against Section 9.

10.2 Delivery Partner Workforces On Stravica Contracts

- Only named, pre-notified operatives may work on Stravica contracts. The delivery partner provides a named operative list, confirming that right to work checks have been carried out and that training is in date.
- Every operative carries photo ID and wears branded workwear. Operatives who are not on the list are not permitted to work.
- Delivery partners confirm the employment status of each operative and that pay meets legal minimums.
- Delivery partners must disclose any use of agency labour or labour-only subcontractors before they are deployed.
- Stravica reserves the right to speak confidentially with operatives during audits about their recruitment, pay and working conditions.

No Name, No Work

Every person attending a Stravica contract must be a named, verified, legally entitled worker. Unknown workers are a modern slavery risk as well as a safety and safeguarding risk, and they are not permitted on Stravica contracts under any circumstances, including during emergency mobilisations.

11. Product Supply Chain Risks

Most modern slavery risk in Stravica's product supply chain lies beyond tier 1, in manufacturing overseas. Stravica addresses these risks as follows.

Product Category	Known Risk	Stravica Approach
Disposable nitrile gloves	Forced labour indicators, including recruitment fee debt and excessive hours among migrant workers, have been documented in parts of global glove manufacturing, leading to import restrictions in some markets	Delivery partners must buy from suppliers who can provide evidence of supply chain due diligence or ethical audit; preference for brands with published modern slavery statements and remediation programmes
Respirators, coveralls and workwear	Textile and garment supply chains carry documented forced labour risk in some regions, including cotton sourcing	Preference for suppliers with published statements and recognised audit programmes; avoidance of products linked to state-imposed forced labour

Product Category	Known Risk	Stravica Approach
Electronic monitoring equipment and sensors	Electronics manufacturing and mineral supply chains (such as cobalt and tin) carry labour exploitation risk	Preference for manufacturers with responsible minerals and labour due diligence programmes
Copper pipework and fittings	Mining supply chains may carry labour risk	Purchase through established UK merchants with supplier codes of conduct
Chemicals	Generally lower risk in UK and European manufacturing	Standard supplier standards and attestation
Laboratory services	Low risk; UK-based skilled workforce	Standard supplier standards and attestation

Stravica recognises that it has limited direct purchasing power over global product supply chains. It will use its influence through its delivery partners, prefer suppliers that are transparent, and act on credible evidence of forced labour linked to products used on its contracts.

12. Recognising Exploitation On Client Premises

Water hygiene operatives regularly enter homes, lofts, roof spaces, plant rooms and communal areas, often in social housing and other residential settings. They are therefore in a position to notice signs of exploitation that others may miss. This is a valuable safeguarding opportunity, and Stravica takes it seriously.

12.1 What Operatives May Encounter

Situation	Possible Indicators
Cuckooing	A vulnerable tenant appears frightened or controlled; unfamiliar people are present or come and go frequently; signs of drug activity; the tenant is not allowed to speak alone
Cannabis cultivation	Covered windows; strong smell; high humidity; unusual electrical wiring or bypassed meters; altered plumbing or water supplies; people living on the premises in poor conditions who may be forced to tend the plants
Overcrowded or controlled housing	Many mattresses in rooms; many people living at one address; workers collected and dropped off together; residents who appear to have no control over their documents or movement
Domestic servitude	A person who appears to do all the household work, is not allowed out, has no access to their own documents or money, or appears afraid of the household
Exploitation of co-workers	A worker who cannot speak for themselves, is always accompanied, appears to owe money to a recruiter, has no access to their wages, or has no proper safety equipment

12.2 What Operatives Must Do

- Do not confront anyone, investigate, or put yourself or others at risk.
- If someone is in immediate danger, leave safely and call 999.
- Leave the property in the normal way where it is safe to do so. If a cannabis cultivation site is found, leave and do not touch any electrical installations.
- Report the concern to your supervisor and to Stravica the same day, recording only what you saw and heard.

- Stravica will inform the client, whose safeguarding and tenancy teams may already be involved, and the police or safeguarding authority as appropriate.

Safety First

Water hygiene operatives are observers, not investigators. The right action is to notice, leave safely and report. Stravica and the client will take it from there with the appropriate authorities.

13. Reporting And Response

13.1 How To Report

Anyone working on a Stravica contract can report a concern to the Modern Slavery Lead at adeola.ola@stravica.uk or on 07845563828, or through the confidential routes in Section 15. Concerns may also be reported directly to the Modern Slavery & Exploitation Helpline on 08000 121 700, which is open 24 hours a day, or anonymously to Crimestoppers on 0800 555 111.

13.2 Stravica's Response

1. Immediate safety: if anyone is in immediate danger, call 999.
2. Record: the Modern Slavery Lead records the concern factually, using the words of the person reporting.
3. Assess: the Modern Slavery Lead assesses the concern the same day and decides on the next steps.
4. Refer: concerns are referred to the police on 101 (or 999 in an emergency), to the local authority safeguarding team where an adult at risk or a child may be involved, and to the client. Stravica is not a First Responder organisation and does not make NRM referrals itself. Instead it supports referrals by the police, local authority or other First Responders.
5. Contain: where the concern involves a delivery partner or supplier, Stravica may suspend the relevant activity or individual from its contracts pending review, while ensuring that no action puts a potential victim at further risk.
6. Investigate: Stravica reviews its own controls and the relevant supplier's controls, without interfering in any police investigation.
7. Remediate and learn: corrective actions are agreed, tracked and closed, and lessons are shared.

13.3 Scotland

In Scotland, concerns about trafficking or exploitation are reported to Police Scotland on 101 (or 999 in an emergency). Support for adult victims is provided under the Human Trafficking and Exploitation (Scotland) Act 2015.

14. Victim Support, Confidentiality And Data Protection

- The safety, dignity and wishes of potential victims come first. Stravica will not take any action, such as abruptly terminating a supplier, that could worsen a potential victim's situation without first considering their welfare.
- Potential victims are signposted to specialist support through the Modern Slavery & Exploitation Helpline, the police and the safeguarding authorities.
- Information about concerns and the individuals involved is shared strictly on a need-to-know basis with those responsible for safeguarding, investigation and law enforcement.
- Personal data is processed lawfully under UK GDPR and the Data Protection Act 2018, in line with Stravica's Data Protection & GDPR Policy.

15. Whistleblowing And Grievance

Stravica encourages anyone, including delivery partner operatives and supplier workers, to raise concerns about modern slavery or labour exploitation. Concerns can be raised in confidence with the Modern Slavery Lead, or anonymously through the external helplines listed in Section 13.

- No one will suffer any detriment for raising a concern in good faith, even if it turns out to be mistaken.
- Workers are protected under the Public Interest Disclosure Act 1998.
- Delivery partners must operate their own confidential grievance routes and must not discourage or penalise workers who contact Stravica or the helplines directly.
- Any retaliation against a person who raises a concern is treated as a serious breach of this policy.

16. Training And Awareness

Audience	Content	Frequency
All Stravica personnel	This policy; indicators of modern slavery; reporting routes; supply chain risks	Induction and annually
Delivery partner operatives on Stravica contracts	Recognising exploitation among co-workers and on client premises; safe reporting; "No Name, No Work"	Contract induction and annual toolbox talk
Delivery partner supervisors and contract managers	Labour supply risks; agency vetting; right to work; handling disclosures; supporting audits	Induction and annually
Compliance and procurement	Due diligence methods; risk assessment; contract clauses; PPN 009 requirements	Induction and annually
Director (Modern Slavery Lead)	Legal duties; Procurement Act 2023 exclusion grounds; statement preparation; working with authorities	Annually

Training records are maintained, and completion rates are reported as a KPI. Awareness materials include the helpline numbers and are provided in languages other than English where operatives need them.

17. Remediation And Non-Compliance

17.1 Supplier Non-Compliance

Where a delivery partner or supplier fails to meet the standards in this policy, Stravica prefers to work with them to remediate the issue, where this protects workers and is appropriate. Remediation plans set out the actions required, the responsible owner, deadlines and how completion will be verified. Remediation must address harm to workers, for example by repaying unlawful recruitment fees or unpaid wages.

Stravica will suspend or terminate the relationship where:

- Modern slavery is substantiated and the supplier is complicit or fails to cooperate.
- The supplier refuses audits, conceals information or retaliates against workers.
- Remediation is not completed within the agreed timescale.

17.2 Internal Breaches

Any breach of this policy by Stravica personnel will be dealt with under disciplinary procedures and may lead to dismissal and referral to the authorities.

18. Performance Monitoring And Review

18.1 Key Performance Indicators

KPI	Target
Delivery partners with completed modern slavery due diligence before appointment	100%
Delivery partners with current annual attestation	100%
Operatives on Stravica contracts appearing on the approved named operative list	100%
Stravica personnel completing modern slavery training	100%
Delivery partner operatives briefed at contract induction	100%
Concerns acknowledged and assessed by the Modern Slavery Lead	Same working day
Supplier remediation actions closed by their due date	At least 90%
High-risk product categories reviewed	All, annually

18.2 Review

The Director reviews modern slavery KPIs, concerns and supply chain changes at least quarterly. This policy is reviewed annually and whenever legislation, guidance or the supply chain changes significantly. Findings feed into the annual Modern Slavery Statement.

19. Annual Modern Slavery Statement

Stravica will publish a voluntary annual Modern Slavery Statement on its website, approved and signed by the Director, within six months of the end of each financial year. The first statement will cover Stravica's first full financial year. Each statement will follow the six areas recommended in Home Office guidance:

1. Organisation structure, business and supply chains.
2. Policies relating to modern slavery.
3. Due diligence processes.
4. Risk assessment and management.
5. Effectiveness, measured against the KPIs in Section 18.
6. Training on modern slavery.

Statements will be submitted to the UK Government's Modern Slavery Statement Registry, and previous statements will remain available for comparison.

Appendix A – Indicators Of Modern Slavery

No single indicator proves that someone is a victim, but several together should prompt a report.

Category	Indicators
Appearance and behaviour	Signs of physical or psychological abuse; fear, anxiety or withdrawal; appears malnourished or exhausted; gives scripted answers; avoids eye contact; distrusts authorities
Control	Does not hold their own ID or bank card; someone else speaks for them; always accompanied; collected and dropped off in groups at unusual times; restricted freedom of movement
Work	Long or excessive hours; no contract; wages withheld, below the legal minimum or paid to someone else; unexplained deductions; no PPE or unsafe conditions; owes money to a recruiter or employer
Living	Lives at the workplace or in overcrowded accommodation provided by the employer; many workers registered at one address; poor living conditions
On client premises	Signs of cuckooing, cannabis cultivation, domestic servitude or controlled multiple occupancy, as described in Section 12

Appendix B – Response Flow

Step	Action	Who
1	Is anyone in immediate danger? If yes, move to safety and call 999	Person who identifies the concern
2	Do not confront or investigate; leave safely	Person who identifies the concern
3	Report to supervisor and to the Modern Slavery Lead the same day	Person who identifies the concern
4	Record the facts in the reporter's words	Modern Slavery Lead
5	Assess and refer to the police, the safeguarding authority and the client as appropriate	Modern Slavery Lead
6	Support any NRM referral made by a First Responder	Modern Slavery Lead
7	Contain supplier risk without endangering potential victims	Modern Slavery Lead
8	Review controls, agree remediation and record lessons learned	Modern Slavery Lead and delivery partner

Appendix C - Delivery Partner Due Diligence Questionnaire

Section	Questions And Evidence Required
Organisation	Company number, directors, beneficial owners, group structure
Policies	Modern slavery policy or statement; whistleblowing policy; recruitment policy
Recruitment	How operatives are recruited; confirmation that no fees or deposits are charged; use of agencies and how they are vetted
Right to work	Process and records for right to work checks
Pay	Confirmation of National Minimum Wage or National Living Wage compliance; payment method; deductions policy
Employment status	Proportion of employed, agency and self-employed operatives; how status is determined
Hours	Working hours and overtime arrangements; Working Time Regulations compliance
Accommodation and transport	Whether any is provided to workers, and on what terms
Worker voice	Grievance and confidential reporting routes
Supply chain	Due diligence on PPE, glove and workwear suppliers; flow-down of standards
History	Any investigations, allegations, enforcement or convictions relating to labour exploitation, and any entry on the debarment list
Training	Modern slavery training provided to managers and operatives
Declaration	Signed by a director confirming the accuracy of the responses

Appendix D - Minimum Contract Clauses

1. The supplier shall comply with the Modern Slavery Act 2015, the Human Trafficking and Exploitation (Scotland) Act 2015 where applicable, and Stravica's Modern Slavery & Human Trafficking Policy.
2. The supplier warrants that neither it nor its officers, employees or subcontractors have been convicted of any offence involving slavery or human trafficking, or been the subject of any related investigation, except as disclosed in writing.
3. The supplier shall not charge workers recruitment fees, retain identity documents or use debt to control workers.
4. The supplier shall deploy only named, verified, legally entitled operatives on Stravica contracts.
5. The supplier shall notify Stravica within 24 hours of becoming aware of any actual or suspected modern slavery in its business or supply chain connected with Stravica contracts.
6. The supplier shall permit Stravica and its clients to audit relevant records and to speak confidentially with workers.
7. The supplier shall implement any remediation plan agreed with Stravica, including remediation for affected workers.

8. The supplier shall flow down equivalent obligations to its own suppliers and subcontractors.
9. Breach of these obligations entitles Stravica to suspend or terminate the contract with immediate effect.

Appendix E – Supply Chain Risk Register Summary

Category	Inherent Risk	Main Controls	Residual Risk
Specialist water hygiene delivery partners	Medium	Due diligence; named operatives; audits; attestations	Low
Agency and labour-only subcontracting	High	Prior disclosure; agency vetting; right to work assurance; confidential worker conversations	Medium
Disposable gloves	High	Supplier evidence of ethical audit; preference for transparent brands	Medium
Workwear and RPE	Medium	Supplier statements and audit programmes	Low to medium
Monitoring equipment and electronics	Medium	Preference for manufacturers with responsible sourcing programmes	Low to medium
Copper pipework and fittings	Medium	Established UK merchants with codes of conduct	Low
Chemicals	Low	Supplier standards	Low
Laboratories	Low	Supplier standards	Low
Couriers and waste carriers	Medium	Supplier standards; registered carriers	Low

Appendix F – Key Contacts

Contact	Details
Stravica Modern Slavery Lead	Adeola Olanrewaju, Director - adeola.ola@stravica.uk - 07845563828
Emergency	999
Police (non-emergency), including Police Scotland	101
Modern Slavery & Exploitation Helpline (24 hours)	08000 121 700
Crimestoppers (anonymous)	0800 555 111
Local authority safeguarding teams	Contact details recorded for each contract area at mobilisation

Stravica Ltd

- 20-22 Wenlock Road, London N1 7GU
- info@stravica.uk | www.stravica.uk
- Company No. 16756638