

ANDEL LIMITED MODERN SLAVERY POLICY

What is Modern Slavery?

1. Slavery is defined as a violation of a person's human rights. It can take the form of human trafficking, forced and/or bonded labour, forced or servile marriage, descent-based slavery and domestic slavery. A person is in modern slavery if they are:
 - a. forced to work through mental or physical threat
 - b. owned or controlled by an "employer", usually through mental or physical abuse
 - c. dehumanised, treated as a commodity or sold or bought as "property"
 - d. physically constrained or has restrictions placed on their freedom of movement

The use of Slavery in the production of goods and services

1. Typically, the products bought nowadays have passed through a long chain of producers, manufacturers, distributors and retailers who have all participated in its production, delivery and sale. It can therefore be very difficult to certify that a product has or has not been produced using slavery. However, the way in which companies operate and manage their supply chain can affect the likelihood of slavery being a part of the final product. The Modern Slavery Act gives responsibility to companies for ensuring that no slavery has occurred, and this applies not only to the products they sell or the services they provide themselves but also to their suppliers, and the suppliers of their suppliers, all the way down the supply chain.

The Modern Slavery Act 2015 - what companies are required to do?

1. [The Chartered Institute of Purchasing and Supply \(CIPS\)](#) has released some guidance to help small businesses comply voluntarily with the Act; however, they suggest that ALL companies:
 - a. ensure all UK workers receive minimum wage and robust immigration checks.
 - b. map supply chains to identify where there is highest risk and exposure to modern slavery.
 - c. undertake site inspections.
 - d. provide training to employees and local suppliers on modern slavery risks and compliance.

Making water sustainable for a cleaner and safer environment.

Andel Ltd. Head Office, Unit 1 Dodworth Business Park South, Upper Cliffe Road, Dodworth, Barnsley S75 3SP, UK
+44 (0)1484 845 000 help@andel.co.uk www.andel.co.uk Offices in Netherlands and Romania

Registered in England No. 2722655 Registered Office: Bank Chambers, Market Street, Huddersfield, West Yorkshire HD1 2EW VAT Reg. No. GB 779 8250 69



- e. review supplier contracts to include obligations to comply with the Modern Slavery Act (2015).
- f. publish a statement outlining the steps you are taking to tackle modern slavery (for businesses with a turnover of >£36K, [Section 54 Modern Slavery Act \(2015\)](#)).

What Andel Ltd. is doing to ensure compliance?

- a. Andel Ltd.'s stance on modern slavery, it explains how employees can identify any instances of this and where they can go for help.
- b. Andel Ltd.'s pre-employment procedures confirms that eligibility to work in the UK checks are conducted on all employees, including but not limited to checking an original passport, birth certificate or other qualifying documentation.
- c. [Andel Ltd.'s Public Interest Disclosure Policy](#). This ensures all employees know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- d. Code of Good Business Practice. This code explains the way we behave as an organisation and how we expect our employees to act.

Anti – Slavery & Human Trafficking Statement 2021

1. Andel Ltd are committed to wholly embracing the aims and ideals of the Modern slavery Act 2015, we have continued to analyse and implement its intentions throughout our business and supply chains. Andel Ltd., Its Managing Director, Senior Management cadre and all employees are fully dedicated to ensuring that there is no slavery or human trafficking within our own and outside agencies supply chains and will continue to commit to the battle against modern day slavery throughout the UK and Europe.

All Employees

1. Andel Ltd., through our company wide employment policies, have communicated our Modern-Day Slavery Policy throughout the workforce and have instilled the integrity to report potential slavery within the workplace. In addition, we have ensured our employees possess the information on how to identify symptoms of slavery in everyday life, along with details on reporting, be it through our Whistleblowing Policy or externally via Government Agency electronic media.

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Contractors & Supply Chain

1. Anadel Ltd. apply reasonable due diligence to risk assess our supply chain, utilising the following methodologies to accomplish this:
 - a. We will complete an annual review of dedicated suppliers to identify areas of risk.
 - b. From this review, highlight any suppliers that may identify as a high risk of modern slavery occurring within their own supply chains or processes.
 - c. Identified “higher risk” suppliers will be contacted to determine the robustness of their own anti-slavery policies and mechanisms.
 - d. Anadel Ltd. Will ensure all new contracts have thorough adherence to The Modern slavery Act through their own policy statement included as per terms and conditions.

Our Policy

1. We have embarked on and completed a formal review of our Modern-Day Anti-Slavery Policy. In doing so, we are satisfied that it meets our own moral requirements, and no further amendments are required at this time. Slavery and human trafficking are heinous and serious crimes, Anadel Ltd. and its employees are pleased to submit this statement outlining our pledge to the aims of the Modern Slavery Act.

Signed:



Peter Double

Managing Director

Anadel Limited

14th April 2026

Rev 3.0

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