

## Modern Slavery Statement

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This statement is made on behalf of Water Plus Group Limited and its subsidiaries, Water Plus Limited and Water Plus Select Limited ('Water Plus' / 'We' / 'Us' / 'Our') pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act) and constitutes Water Plus' slavery and human trafficking statement for the period until 31st March 2025.

Water Plus recognises that modern slavery and human trafficking are significant issues presenting a challenge for businesses. We are committed to improving our practices to combat slavery and human trafficking.

We take a zero-tolerance approach to modern slavery, being committed to acting ethically and with integrity in Our business dealings.

### Group overview

Water Plus is a joint venture that commenced trading as a water retail service provider to business customers from June 2016, having combined the pre-existing non-household retail businesses of the two largest FTSE100 water utility companies: Severn Trent Plc and United Utilities Group Plc.

We are the largest non-household water and wastewater retailer, serving approximately 27% of England supply points and 2% of supply points in Scotland to companies of all sizes in both private and public sectors. Our core activities are billing, meter reading, customer support, and water-efficiency advice. Additionally, We offer key account management services, provision of management information, and help customers reduce costs and improve resilience through services such as leakage detection and repair, water audits, benchmarking, smart metering, contingency planning and emergency water supply.

Water Plus employs circa 500 employees across its operations, operating on mainland UK.

### 1. Our policies on slavery and human trafficking

To reflect Our commitment to acting ethically and with integrity in all Our business relationships, minimising the risk of modern slavery, We have the following policies:

- Anti-Slavery Policy
- Anti-Bribery & Corruption Policy
- Equality & Diversity Policy
- Whistleblowing Policy

We are also dedicated to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place.

### 2. Employment practices

We rigorously check all of Our employees have the right to work in the United Kingdom and are paid at or above the National Living Wage.

In addition to the employment rights and benefits which are provided to employees, our contracts of employment and policies make clear to all employees what actions and behaviours are expected of Our people.

### 3. Our Supply Chain

Our supply chain is reliant on around 270 suppliers with the majority based in the UK to deliver Our operations responsibly. Our supply chain includes:

- Providers of business critical internal services such as equipment, IT and software programmes;
- Providers of customer-facing services such as meter readers, customer care, water efficiency experts and other value added service providers; and
- Providers of customer engagement services such as field sales agents, brokers and third-party intermediaries.

Our supply chain consists largely of persons that are not in a category which is generally seen to be vulnerable to modern day slavery. Much of our supply chain is based within the UK with some back-office activity provided from by Our service provider in India and South Africa and our IT support provided from various countries. Our focus is to ensure that there are policies and procedures in place for Our contractors and suppliers to ensure all of Our suppliers adopt Our high standards to help mitigate the risk of modern slavery. This approach is backed up by robust contractual clauses and visits to Our higher risk suppliers. We also work collaboratively with them and clearly set out Our zero tolerance approach.

### 4. Due diligence process for slavery and human trafficking

Before We engage with any new supplier, We conduct a review of their business, including their supply chain, as far as is reasonably practicable. Each new supplier is required to confirm that they comply with all applicable laws and regulations, including the Act. They are also required to confirm compliance with Our Anti-Slavery Policy.

This policy includes introducing preferred supplier agreement arrangements with those recruitment agencies we use for the supply of temporary and agency workers to define responsibilities more clearly around completion of regulated employment checks by agencies.

### 5. Training for our People

Training is provided annually on Our obligations and the risks of modern slavery within Our business relationships to all senior managers and those specifically involved in the procurement and management of suppliers and 100% of such employees (other than those on long term sick/maternity) have completed this training in the last 12 months.

Annual online compliance training is provided for all employees (other than those on long term sick/maternity) - again with 100% completion rates in the last 12 months for the following:

- Code of Conduct (includes discrimination and ethical trading)
- Anti-Bribery & Corruption
- Whistleblowing
- Modern Slavery (UK) and Identifying modern slavery in the supply chain (all senior managers and all officers in Procurement and outsourced third party teams)

### 6. Reporting concerns regarding slavery or human-trafficking

We foster a culture where Our people are encouraged to raise concerns about unlawful, unacceptable practices or misconduct and can do so safely without fear of reprisal. We offer Our full support to those who raise a concern in good faith. Individuals can

confidentially and anonymously report a concern using our SafeCall (whistleblowing) helpline.

Our Whistleblowing Policy ensures Our people know how to raise concerns about any unethical practices within our business or supply chain without fear of reprimand.

## 7. Actions taken in financial year ended March 2024

We took the following steps during the last financial year to improve our arrangements around modern day slavery and human trafficking:

- Our Supplier registration process requires all suppliers to complete a registration form attesting that they have read and are compliant with our Anti-Slavery Policy on Our procurement management system. Suppliers are required to reaffirm commitment annually.
- Require Our key suppliers to provide to Us at the time of registration appropriate attestations and due diligence records in relation to modern day slavery.
- We changed Our terms and conditions of supply to customers to require Our customers to comply with Our anti slavery and other such policies.

## 8. Actions identified to be taken in the forthcoming financial year (FY 2024/25)

In addition to continuing to comply with our internal arrangements in the current financial year to promote awareness of our anti-slavery and human trafficking arrangements, the following has been identified to be performed:

- Supplier due diligence records: Continue to roll out to the wider supplier base the requirement to provide annually their appropriate attestations and due diligence records in relation to modern day slavery.



Jason Scagell  
**Chief Executive Officer**

**Water Plus Group Limited and its subsidiaries, Water Plus Limited and Water Plus Select Limited**  
**30<sup>th</sup> September 2024**