

WALES & WEST UTILITIES

# Modern Slavery Statement

For the Financial Year  
1 April 2025 to  
31 March 2026





# Contents

|                                                     |           |                                                                                                              |           |
|-----------------------------------------------------|-----------|--------------------------------------------------------------------------------------------------------------|-----------|
| ▶ <b>Introduction</b>                               | <b>3</b>  | ▶ <b>Performance</b>                                                                                         | <b>20</b> |
| A bit about us                                      | 3         | Progress                                                                                                     | 20        |
| The way we do things                                | 3         | Effectiveness                                                                                                | 22        |
| Message from Chief Executive Officer                | 3         | ▶ <b>Focus areas for 2026-27</b>                                                                             | <b>23</b> |
| ▶ <b>Our anti-slavery commitment</b>                | <b>4</b>  | Key Performance Indicators (KPIs)                                                                            | 25        |
| ▶ <b>Awareness of modern slavery</b>                | <b>5</b>  | ▶ <b>Statement on the prevention of slavery and human trafficking for Wales &amp; West Utilities Limited</b> | <b>27</b> |
| Speaking up – our whistleblowing approach           | 5         |                                                                                                              |           |
| Training and awareness                              | 5         |                                                                                                              |           |
| Modern Slavery Strategy                             | 6         |                                                                                                              |           |
| Living Wage                                         | 7         |                                                                                                              |           |
| Governance                                          | 8         |                                                                                                              |           |
| ▶ <b>Our ambition, Our priorities, Our values</b>   | <b>9</b>  |                                                                                                              |           |
| ▶ <b>Our people</b>                                 | <b>10</b> |                                                                                                              |           |
| Our recruitment                                     | 11        |                                                                                                              |           |
| Human rights due diligence                          | 11        |                                                                                                              |           |
| ▶ <b>Our policies</b>                               | <b>12</b> |                                                                                                              |           |
| Policy/process alignment to international standards | 14        |                                                                                                              |           |
| Remediation                                         | 14        |                                                                                                              |           |
| ▶ <b>Supply chain and procurement</b>               | <b>16</b> |                                                                                                              |           |
| Overview                                            | 16        |                                                                                                              |           |
| Supplier mapping                                    | 17        |                                                                                                              |           |
| Risk assessment and monitoring                      | 17        |                                                                                                              |           |
| Identified risks                                    | 18        |                                                                                                              |           |

# Introduction

## A bit about us

At Wales & West Utilities, we look after the pipes that keep the gas flowing across Wales and south-west England. We respond to gas emergencies, keeping communities safe; we connect new homes and businesses; we upgrade the gas network, to keep the gas flowing safely and reliably today, and to prepare it to transport the green gases of the future so we can all play our part in the energy transition.

We own and maintain more than 35,000 kilometres of gas pipes – enough to stretch from the UK to New Zealand and back again. Using these pipes – most of which lie hidden beneath your feet – we supply gas to around 2.5 million households and businesses, serving a population of 7.5 million people. We cover an area that stretches from Wrexham to Redruth, from the mountains of North Wales to the cliff tops of Cornwall. We serve diverse communities across cities, towns, villages and open countryside.

We are there for our customers 24 hours a day, 365 days a year – it is a vital service and one that we are extremely proud to deliver.

## The way we do things

While much of our gas network is underground and out of sight, our services play a central role in the daily lives of all our customers. Whether it's a safe and reliable gas supply for heating your home, making the family dinner or for a nice hot bath, we understand how important it is for our services to be there when our customers need them.

Our Ambition, Priorities and Values inform everything we do as a business – from our strategic planning to the performance management of our colleagues. As we navigate a period of change in the energy sector, and respond to cost of living and geopolitical challenges, they help keep our focus on our customers and the future.



## Message from Chief Executive Officer

As a leading infrastructure business, we at Wales & West Utilities take seriously our responsibility to combating modern slavery and human trafficking. We stand by this by being explicitly clear with colleagues and suppliers that we will not tolerate slavery and human trafficking in our supply chains or any part of our business. We counter exploitation through comprehensive governance, targeted staff training, and rigorous supplier compliance audits under the Modern Slavery Act 2015.

Additionally, we continue to build partnerships within the energy and utilities sector, such as the Supply Chain Sustainability School and the Slave-Free Alliance, to reinforce our efforts. By working closely with our stakeholders, we believe we can make a meaningful impact in the fight against slavery and human trafficking. We remain committed to continuous improvement and will evolve our practices to ensure our operations and supply chains remain free from exploitation.

**Graham Edwards**  
Chief Executive



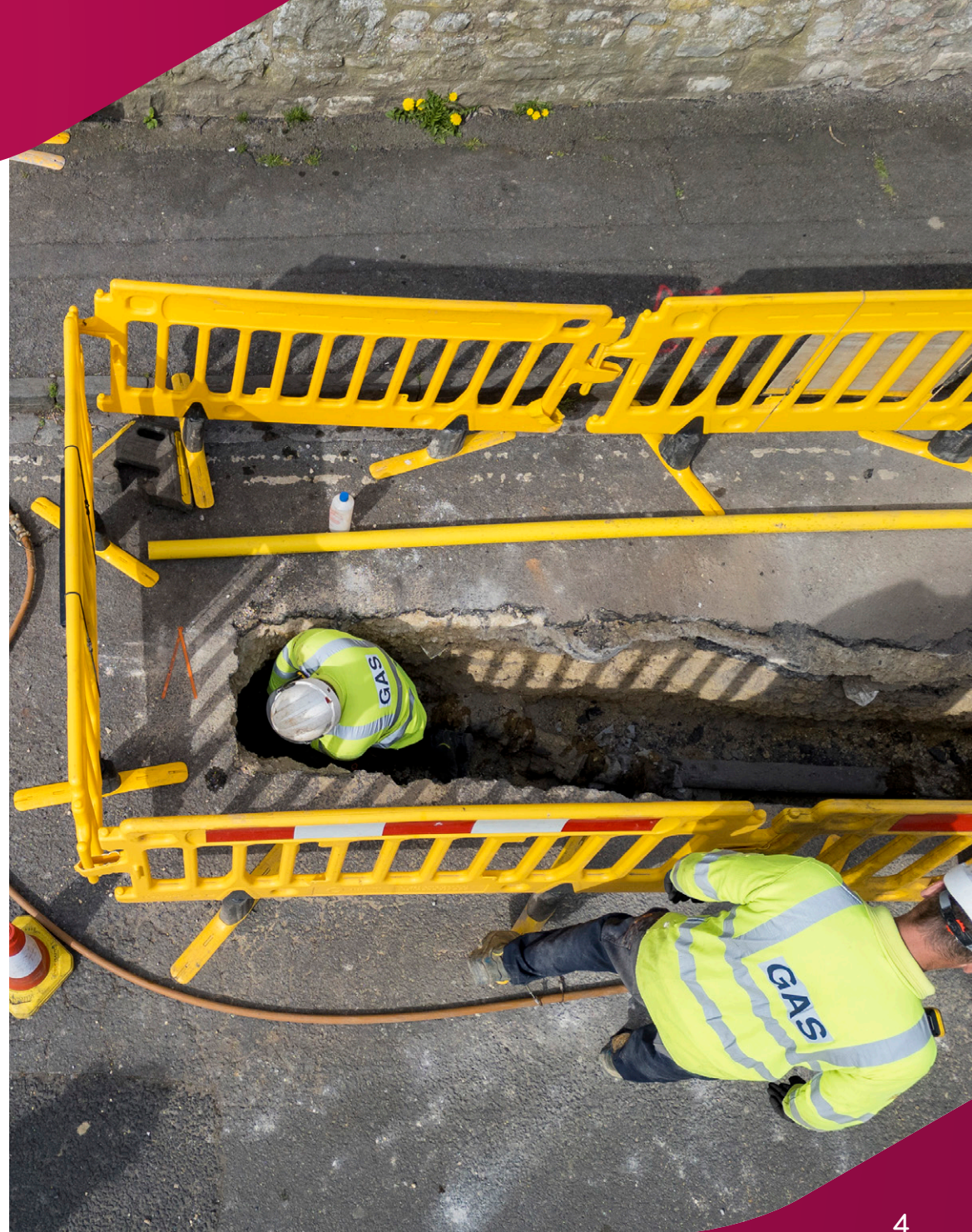
# Our anti-slavery commitment

Wales & West Utilities is owned by a consortium of three corporate shareholders, namely CK Infrastructure Holdings Limited (CKI), Power Assets Holdings Limited (PAH) and CK Hutchinson Holdings Limited (CKHH). CKI is a diversified infrastructure group with operations that span the globe. PAH owns and operates a vertically integrated electricity generation, transmission and distribution business in Hong Kong. CKHH has a diverse portfolio of investments across four core businesses.

Wales & West Utilities and our owners are fully committed to making sure that the group complies with all applicable legal requirements including, without limitation, the Modern Slavery Act 2015.

Alongside our owners, we have a zero tolerance to slavery and human trafficking and are committed to making sure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We highlight our commitment to this effort within our Modern Slavery Policy and Corporate Social Responsibility Policy.

We are committed to improving our practices to combat slavery and human trafficking and encourage reporting on slavery and human trafficking, as well as all other ethical matters. We joined the Slave-Free Alliance in 2019, an organisation set up by the charity Hope for Justice, and we will continue to work with them in the future to improve its systems and processes and the fight against modern slavery.





# Awareness of modern slavery

**Our Modern Slavery Policy adopts a coordinated, victim centred approach, underpinned by the principle that safeguarding is everyone's responsibility. Effective support depends on a clear understanding of the experiences, needs and perspectives of those impacted by modern slavery.**

Modern slavery can be hidden in plain sight, and anyone may encounter signs or information that suggest exploitation is taking place. We therefore encourage all colleagues to remain vigilant, particularly in support of those who may be unable to protect themselves. Whatever the circumstances, it is essential that everyone knows how to respond, and where to access advice and support.

We actively encourage colleagues to report any concerns relating to modern slavery, human trafficking or other ethical issues. Our whistleblowing process ensures concerns can be raised safely and in confidence. This is supported through an independent third-party provider, offering secure reporting channels via telephone or online.

Colleagues are reminded to be aware of potential indicators of modern slavery, including where individuals may:

- ▶ appear to be under the control of another person and reluctant to engage with others
- ▶ lack personal identification documents
- ▶ have limited personal belongings, wear the same clothing daily, or wear inappropriate clothing for their work
- ▶ have restricted freedom of movement
- ▶ be reluctant to interact with strangers or the authorities.

## Speaking up – our whistleblowing approach

As a responsible business, we operate with integrity and in full compliance with all applicable laws and regulations. Our policies and standards are designed to ensure ethical, lawful and professional conduct across all areas of our operations. Maintaining these standards relies on the actions of our people, who are expected to raise concerns where they suspect malpractice or unlawful behaviour, so that issues can be investigated and addressed promptly.

We are committed to creating an open and supportive environment where individuals feel confident to speak up. Concerns can be raised confidentially, without fear of detriment, and will be investigated fairly, thoroughly and without delay.

Our internal whistleblowing process enables concerns relating to modern slavery, suspicious activity, unethical conduct or illegal behaviour – whether within our business or involving third parties – to be raised through a number of channels:

- ▶ via a line manager
- ▶ through an HR Manager (or Trade Union representative if relevant)
- ▶ with a local safety representative (for health and safety concerns)
- ▶ directly with the Head of Internal Audit.

## Training and awareness

We are committed to ensuring that all supplier facing colleagues, including our Procurement team, receive regular updates on human rights policy, and particularly our obligations relating to modern slavery. Our training and awareness approach is designed to equip colleagues



with the knowledge and confidence to identify risks and uphold our zero-tolerance approach across our operations and supply chain.

All colleagues, including Exec members, complete our Modern Slavery e-learning module, which outlines our legal responsibilities under the Modern Slavery Act 2015, the indicators of exploitation, and the actions individuals should take to raise concerns. This training forms a core part of the induction programme for new starters, ensuring that awareness of safeguarding and ethical conduct is embedded from the outset.

In addition, customer facing colleagues complete enhanced safeguarding training, developed with the NSPCC, to strengthen their understanding of vulnerability and how to respond appropriately when engaging with individuals who may be at risk.

Supplier facing teams receive on-going updates relating to modern slavery, ethical supply chain standards and relevant legislative or policy developments. These updates draw on insights from the Slave-Free Alliance, the Utilities Against Slavery working group and our own supplier risk assessment activities, helping colleagues to apply robust due diligence and maintain consistent standards in supplier engagement.

We also promote wider organisational awareness through regular internal communications, policy updates and reminders of available reporting channels, including our independent whistleblowing service. To reinforce this further, we mark Anti-Slavery Day with a dedicated week of internal communications, highlighting key messages and the role every colleague plays in preventing exploitation.

Through training, role specific development and regular communications, we continue to strengthen awareness across our workforce and maintain a proactive approach to preventing modern slavery within our business and supply chain.

### Modern Slavery Strategy

As recommended by the Slave-Free Alliance, we implemented a companywide Modern Slavery Strategy. This strategy sets out the people responsible, their roles and the initiatives we are taking to mitigate against the modern slavery risk in our supply chain and with our colleagues. The strategy documents how we deliver against our legal and moral obligations by having a cross-functional team responsible for managing the risk while providing guidance, developing action plans and reporting progress. The Modern Slavery Strategy was approved by the Environmental, Social and Governance Committee (ESG Committee), which sits at Board level.

### Supply Chain Sustainability School (SCSS)



We are Partner Members of the SCSS, collaborating to upskill our supply chain and Procurement teams in the key areas of sustainability which matter to them. Raising awareness of our current and future topics will help drive competitiveness while increasing efficiency and overall contract success. Partner members collectively form and chair market and trade category groups which drive the direction, delivery and focus of the SCSS.

### Living Wage

The adoption of the Real Living Wage (RLW) in 2022 saw us undertake a voluntary commitment to pay all our colleagues more than the RLW. This commitment extended to staff from any supplier providing permanent services on our sites including cleaning, security, IT, catering and logistics. In addition, we pledged to promote the values of the RLW across our supply base through all opportunities to raise awareness. Our annual supplier survey asks for feedback on adoption rates to track adoption rates over time. Many of our suppliers pay above the RLW as a matter of course, the nature of our business often requires highly skilled and qualified individuals who command higher salaries. Where suppliers are providing lower skilled roles, we find a good indication of an ethical approach to employment from those who are paying or exceeding the required pay scales. A measure of those suppliers intending to introduce the RLW in future is another key ethics indicator, particularly considering additional financial burdens from recent changes to employers' national insurance.

### Slave-Free Alliance

We subscribe to an annual membership with the Slave-Free Alliance. As part of this group, we discuss common issues across different industries as well as review processes to make sure we are applying the same levels of protection and adopting best practice. Membership gives access to invaluable support, experience and guidance which helps to shape our activities.



### Utilities Against Slavery (UAS) working group

As active members of the UAS working group, we regularly meet to build cross-sector awareness, collaborating to leverage skills and experience for mutual benefit. The group has continued to develop materials and toolkits throughout the past year, particularly supporting engagement and training.



### Governance

Executive sponsorship of our anti-modern slavery programme sits with our General Counsel. They are supported by a senior sponsor, our Head of Procurement and Operations Support. Our anti-slavery work is delivered by a number of colleagues across our business, including the following, who, alongside the sponsors, make up the Anti-Modern Slavery Working Group:

- ▶ Company Solicitor
- ▶ Head of Audit
- ▶ Head of People & Customer Experience
- ▶ Procurement Manager
- ▶ Sustainable Procurement Lead

Each group member is responsible for reviewing and updating their respective areas of oversight, reflecting any changes to policy, processes or organisational structure. These reviews should consider the effectiveness of previously agreed actions, the potential impact from emerging risks, opportunities for improvement since the last statement, and proposals for future activity.

The working group meets quarterly and reports to the ESG Committee in relation to the work in this area while bringing Board level oversight. This annual statement provides a current assessment of activities undertaken during the reporting period.





# Our ambition

“Trusted to deliver safe and reliable energy today, while supporting a green energy future and keeping our communities connected.”

## Our priorities

Caring for our  
**customers** and  
**communities.**

Championing  
**greener**  
solutions.

Working **safely**  
and **securely.**

Investing in  
our **people.**

## Our values

**We are proud to  
serve together.**

We're proud of who we are and thrive when we work together – united by purpose – to deliver for our customers.

**We make a  
difference.**

We show that we care by making a positive impact for our colleagues, customers, communities and the environment.

**We do the  
right thing.**

We put safety and security first and act responsibly every day to protect our colleagues, customers and communities.

**We challenge  
ourselves.**

We embrace new ideas so we can grow, innovate and perform at our best, whilst delivering value for money for our customers.

# Our people

**We have a diverse team of more than 1,900 skilled and dedicated colleagues who deliver for the communities we serve.**

In 2021, we changed to an internal delivery model. Since then, we have TUPE transferred 260 of our previously contracted workforce into our directly employed team. The change of delivery model has allowed us to increase our efficiency, using our resources more effectively, while maintaining our focus on customer service and health and safety standards, for customers and colleagues alike. Since we started operations in 2005, we've been focused on delivering outstanding service to our customers – keeping them safe and warm. We have only been able to do this by investing in our people, recruiting more than 170 new apprentices and graduates as well as upskilling colleagues, making sure they have all the skills, confidence and innovative thinking to build our business long into the future.

We are on our Great Place to Work journey, striving to be an employer of choice in our region by fostering a culture of inclusivity, growth and recognition, where every team member feels valued.

We are committed to creating a working environment that supports and fosters equity, diversity and inclusion, where all of our colleagues feel valued and supported to contribute to their full potential. We are focused on creating a culture where it doesn't matter about gender, race, sexuality, or disability; it's about our colleagues' skills, the way we do things and how we live our values. We remain proud of our Equity, Diversity and Inclusion (EDI) Strategy which launched in March 2023 and outlines our direction of travel to build a more diverse, multi-generational and inclusive workforce that better reflects the communities we serve.



Together with a three-year action plan, the strategy continues to be the focal point of our work to create a culture where barriers are broken down and opportunities provided for all. We are embedding equity, diversity and inclusion in management and leadership training, focused on supporting our managers to create a psychologically safe culture and ensure they are confident in discussing matters in relation to EDI, including how to avoid unconscious bias when working with colleagues and customers. We have also rolled out awareness training to all colleagues.

We do not tolerate any form of discrimination, any form of discrimination is unacceptable conduct, and any allegation of discrimination will be investigated through our Disciplinary or Grievance Procedure. We are proud that our commitment to equality is demonstrated in our gender pay reporting.





We make sure that all organisations working on our behalf, and other organisations that we are connected to, are fully aware of our commitments to equity, diversity and fairness.

### Our recruitment

All new and existing colleagues are subject to prescribed right to work checks that help us make sure we do not employ people without the legal right to work, thereby complying with the Immigration, Asylum and Nationality Act 2006. Additionally, any third-party organisations who are contracted to work on our behalf are required to apply a similar procedure for their team too. We recognise that stringent checks as part of our recruitment process act as a strong protection against potential victims of modern slavery entering our workforce.

For applicable roles, they are also subject to Disclosure and Barring Service and National Security Vetting checks to ensure we comply with the part we play in safeguarding and to ensure we play our role

in providing the appropriate protection from these changing threats to underpin the safety, security and reliability of the UK's energy supply.

Our Modern Slavery Policy highlights our commitment to acting ethically and with integrity in all our business relationships. It also implements and enforces effective systems and controls to help us address the risk of modern slavery and human trafficking in our supply chains. Furthermore, our Corporate Social Responsibility Policy highlights our commitment to combating slavery and human trafficking. We operate a Code of Conduct for our colleagues. This requires them to uphold our high standards of integrity, honesty and transparency in everything they do. Colleagues must report any possible breach of the Code of Conduct to one of: their line manager; our HR team; a member of our Senior Management Team; or via our confidential whistleblowing line.

### Human rights due diligence

The human rights due diligence (HRDD) approach takes steps to mitigate the risk of abuse. Policies covering recruitment, modern slavery, procurement and safeguarding are established and reviewed periodically to ensure responsible conduct is embedded. Risks are identified and assessed following changes to legislation or operational activities where an alternative approach may need to be adopted. Where emerging risks are recognised, appropriate measures are taken to mitigate. Consistent records of the number of suppliers creating a statement, having embedded policies or recording cases of modern slavery demonstrate the effectiveness of measures taken in raising awareness and standards. Our Modern Slavery Statement publicly reports our progress, the challenges faced in the previous reporting period and plans for continuous improvement.

# Our policies

We regularly review and update all policies and processes to ensure we are setting clear, relevant expectations. A number of key policies highlight and supplement our modern slavery commitment and the standards we expect for prevention, detection and reporting.

| Policy                     | Aim and link to modern slavery                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Modern Slavery Policy      | The Modern Slavery Policy and associated risk management is fundamentally shaped by two global frameworks: the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct. The policy strives to support the aims of these frameworks by enabling the business to better prevent, detect and report the risks of modern slavery throughout our operations. |
| Our Rules of Conduct       | Sets out the standards we expect from our colleagues. Responsible behaviour is fundamental to how we work. This is supported by our Ambition, Priorities and Values.                                                                                                                                                                                                                                                                                                                     |
| Code of Business Conduct   | Defines our values, sets out the behaviour we should all demonstrate in our work and summarises the policies most relevant to our business conduct.<br><br>It is designed to help us to do this by describing how we can judge whether we are doing the right thing, by giving guidance on some of the issues we might face, by listing key policies relevant to business conduct and highlighting possible conflicts of interest.                                                       |
| Equal Opportunities Policy | We are committed to ensuring that all job applicants and existing colleagues are always treated fairly and with respect. No individual will receive less favourable treatment on the grounds of sex, race, marital status, disability, age, part-time or fixed-term contract status, sexual orientation, or religion.                                                                                                                                                                    |
| Procurement Policy         | Supports our business by recognising stakeholder expectations and minimising the risk of non-compliance. The Procurement team aims to provide the business with a best-in-class service line by sourcing and selecting partners in a supply chain which is able to collaborate with us to achieve our business goals – share our commitments to a fair, diverse and inclusive culture, and have an unyielding position on slavery and human trafficking.                                 |

Continued



## Our policies

| Policy                             | Aim and link to modern slavery                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Supplier Charter                   | Outlining our expectations of the supply chain, our Supplier Charter sets out how our responsible approach to procurement will support our vision for sustainable relationships. We are committed to being an ethical business and our Charter sets out how our suppliers should support that vision, sharing our expectations of how we will contribute positively to the society and environments in which we operate. We are determined to protect our reputation as a reputable business, and meet our obligations as set out by our regulator Ofgem. Alongside existing standards and compliance, suppliers are expected to acknowledge and adopt all principles within the Charter. |
| Anti-Bribery and Corruption Policy | Outlines how we will deal fairly with our suppliers and work to develop relationships with them based on honesty, fairness and mutual trust. We will settle bills punctually and work to ensure no bribery, gifts or hospitality are sought, solicited, accepted or given. We will not work with suppliers that infringe the law or which, by association, endanger our reputation. We will favour suppliers with high standards of business conduct.                                                                                                                                                                                                                                     |
| Whistleblowing Policy              | Aims to create the climate and the opportunities for everyone both to do the right thing and speak out confidentially, confident the facts will be investigated fairly, thoroughly and promptly. To further strengthen this whistleblowing process, we have partnered with Safecall – an organisation that provides an independent means to report any concerns. This policy sets out how our colleagues can expect to be treated if they speak out about any genuinely held concerns about actions or decisions that they think are wrong.                                                                                                                                               |
| Recruitment Processes              | Sets out the standard we expect our managers to abide by as well as making sure we remain consistent within our recruiting processes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Disciplinary Procedure             | The primary purpose of the disciplinary procedure is to support colleagues in improving where standards of performance or conduct fall below expectations. It is intended to provide a fair and consistent framework that encourages individuals to achieve and maintain the required standards of behaviour and job performance.                                                                                                                                                                                                                                                                                                                                                         |
| Safeguarding Policy                | Sets out how we as a business can safeguard our colleagues, customers and suppliers. It gives key examples of what signs to look out for regarding modern slavery.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

Policies and associated risk management are fundamentally shaped by two global frameworks: the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct. We strive to support the aims and initiatives of these frameworks by enabling the business to better prevent, detect and report the risks of modern slavery throughout our operations. All companywide policies where a potential or perceived link to modern slavery risk may exist, make specific reference to the Modern Slavery Policy as overarching guidance.

Policy/process alignment to international standards

| International Standard Step (OECD/UNGP) | Corresponding Policy/Process                                     |
|-----------------------------------------|------------------------------------------------------------------|
| Embed responsible conduct               | Supplier Charter, Modern Slavery Policy                          |
| Identify and assess risks               | Supplier mapping, Worker engagement                              |
| Cease, prevent and mitigate             | Responsible procurement, Ethical recruitment, Colleague training |
| Track implementation                    | Monitoring and evaluation, Data analysis                         |
| Communicate results                     | Annual Modern Slavery Statement                                  |
| Provide remediation                     | Whistleblowing procedures, victim-centred escalation             |

Remediation

The response to a suspected case of abuse is set out in the Modern Slavery Policy, the primary focus being an individual’s safety and removing them from the risk of further harm before establishing if the risk extends to others. An immediate investigation will be undertaken to determine appropriate short-term actions, which could include notifying the appropriate authorities while gaining assistance from the Slave-Free Alliance. Once the severity of the situation is established and managed, a full investigation will be conducted. This will gather information surrounding the claim, trigger the suspension of any affected or suspected supplier, and ensure that evidence is preserved.





### Concern raised

- A concern can be raised in a number of ways, for example via our whistleblowing hotline, email, letters, reports to line managers etc.
- All concerns raised are dealt with in the strictest confidence and all concerns are handled in the same way.

### Notification

- The Internal Audit Team, General Counsel, Executive team and Modern Slavery Working Group will be notified.
- The Corporate Affairs team will also be notified with updates on the incident to manage any external communications required.
- Ensure that any persons identified as at risk are made safe, which may include moving them to a place of safety where there is an immediate risk of harm.
- Establish whether there is any further persons at risk and an immediacy of harm, including those potentially caused by victims absconding.

### Investigation

- An immediate plan for investigating the concern will be made by the notified team. This may include an internal or external auditor as well as notifying the authorities of asking for assistance from the Slave-Free Alliance.
- Any data gathered will be secured to support next steps, including details of the victim(s) concerned including the location(s).
- Any investigation will be confidential with the main aim of helping anyone identified as being affected by the concern raised.
- An investigation will also be conducted into the whole of the supply chain which is affected by the concern raised.
- Use of any supplier concerned will be suspended until the outcome of the investigation.

### Outcome

- A final internal report will be written with any actions resulting from the concern raised. Any learning from the report will also be disseminated across the necessary teams for best practice. The final report will be presented to the executive team and the Board.
- If any concern raised leads to an actual incident of modern slavery then this will be reported to the authorities and we will assist in any criminal investigation.

# Supply chain and procurement

## Overview

We spend more than £360m every year across a diverse range of goods and services, engaging with over 1,300 suppliers. Some professional services (0.18% of spend) relating to IT, engineering and travel are sourced from the EU and US, otherwise our supply base is predominantly UK based. Where relevant, we use Achilles Utilities Vendor Database (UVDB) as an approved qualification system for the purposes of compliance with the Utilities Contracts Regulations 2016. This includes a standard selection questionnaire requiring suppliers to confirm compliance with the Modern Slavery Act 2015 as a prerequisite to registration and approval pursuant to the UVDB. Our pre-qualification questionnaire (PQQ) is regularly updated to ensure that compliance with the Modern Slavery Act 2015 remains a condition of the selection process. As a valuable engagement tool, the Supplier Charter outlining our expectations is being embedded across all routes of supplier acceptance and onboarding.

The goods and materials used to support operations are stored across our network of depots, controlled and maintained by directly employed colleagues. Distribution is managed in conjunction with a logistics partner providing warehouse, vehicle, waste and recycling services utilising Wales & West Utilities premises and fleets to promote the highest levels of visibility and process control.

Our business model expects all interactions with customers, suppliers and anyone affected by our operations to be defined by our Priorities and Values. The Procurement Policy and Code of Business Conduct clearly set out a framework of expectations. This includes supplier relationships based on honesty, fairness and mutual trust. We commit to settle bills





punctually and work with suppliers to ensure an environment of equal and fair opportunity. We take seriously our obligations under the Competitions Act and all other relevant laws and will not engage in anti-competitive practices. Where a commercial agreement is entered into, we ensure that all suppliers are treated equally, none received unfair advantage or disadvantage, have received appropriate consideration if a small to medium enterprise, and are awarded under all applicable Government and Regulatory legislation without conflict of interest.

### Supplier mapping

Supply chain analysis currently relies on internal systems to develop an understanding of how supply partners prepare for and embed sustainability across a range of themes. The existing questionnaire is deployed annually using digital forms to generate a web-based survey, allowing real-time analytics and imported responses to populate an internal database. This versatile and user-friendly solution supplements and verifies the wider supplier database in support of contract management. Priority areas of focus are:

- ▶ Procurement relevant suppliers – where Wales & West Utilities actively manages the award and performance of a contractor.
- ▶ High-risk activities – determined by either core business function or geographical area.
- ▶ Segmentation – where the supplier relationship may provide inadequate information on supplier activities.

In early 2026, we requested information on several topics including:

- ▶ Modern slavery awareness (published statement, established

policies, known occurrences, Tier 1 suppliers mapped).

- ▶ Primary business activity (geography, industry/sector, turnover, number of employees).
- ▶ Real Living Wage (currently paid, plans to adopt).
- ▶ Environmental activities and awareness (product lifecycle analysis, end of life opportunities, single use plastics, returnable packaging).
- ▶ Acceptance of the Supplier Charter.

Feedback remains voluntary with variable response levels. In addition, recent developments in cyber resilience are making web-based surveys less effective. Sourcing of a data management tool to centrally store, manage, and report supplier information is underway. Our move to a bespoke system with a supplier portal will enable far greater coverage of the supply chain, with accurate histories from which to better target vulnerabilities over coming years. The database could see on-going monitoring of multiple data sources, allowing measurement against quantitative KPIs. The mapping process is currently managed internally but where a demonstrable advantage in accuracy or consistency is identified, the use of suitable third-party tools will be encouraged.

### Risk assessment and monitoring

Mapping supply chain risk is an important step towards shaping future action plans. Efforts to promote compliance have focused on supplier acceptance of standards, with the expectation that these will be cascaded through supply lines, but we accept that data on the success of such activity is limited. Risk assessment is embedded within the supplier approval process, managed by Procurement, which all prospective suppliers must complete prior to onboarding.

The aim is to build a detailed picture of the links between product, supplier, commodity, resource and geography that will inform future procurement decisions and help identify where change in approach can deliver benefits to risk mitigation and improved supply chain resilience. In addition, the Human Resource team has responsibility for customer services, priority customer engagement and colleague training functions, meaning they are uniquely positioned to ensure staff training is appropriate and any reported or suspected cases of vulnerability are promptly managed.

The business is developing a risk management process to better identify and manage the areas most likely to see disruption. The model will encompass modern slavery metrics alongside typical procurement and environmental risks and will include a modern slavery risk register. The register will formally record areas that require additional focus, promote the development of targeted actions and expect periodical review.

Risk assessment and monitoring are supported by a range of measures designed to provide insight into both supplier and customer bases, including:

- ▶ Annual supply chain surveys to assess supplier awareness of, and actions taken to address, modern slavery risks. The survey expects suppliers to provide feedback on key modern slavery themes:
  - i. Whether they have an established modern slavery policy.
  - ii. Whether they publish an annual statement, regardless of a legislative need to do so.
  - iii. Whether they have knowledge of a suspected recent case of modern slavery within their business.

- ▶ Financial monitoring and risk insight via credit risk partners during supplier approval and throughout contract management, where appropriate.
- ▶ Training for frontline staff to ensure they can recognise indicators of modern slavery in interactions with the public and subcontractors.
- ▶ Use of the Achilles UVDB platform to access current, validated supplier data.
- ▶ Timely review and collection of supplier activity-based credentials.
- ▶ On-going monitoring of media alerts to identify any potential modern slavery concerns within the supply chain.





### Identified risks

- ▶ **Lone working** – Many of our colleagues working directly/indirectly for Wales & West Utilities do so under close supervision due to the nature of the business, whether directly employed or subcontracted. Each receiving the same level of supervision ensures adequate qualification, capabilities and compliance are maintained. We recognise that a potential vulnerability exists where there is a need for lone working, often out of hours and potentially at remote sites. An example would be cleaning services, where unskilled and comparatively low-paid labour could be at risk of exploitation. To mitigate such risk, we are particularly vigilant when partnering with a service provider by ensuring that necessary standards are exceeded in both policy and operational procedure. As an example, our current cleaning service provider maintains all necessary standards, has robust systems in place to identify potential criminality and demonstrates a strong commitment to Social Value and Corporate Social Responsibility. In addition, Wales & West Utilities maintains a direct relationship with the staff themselves. This allows regular informal discussions around pay and conditions.
- ▶ **Global supply chains** – Due to the complexity of modern supply chains, we recognise that potential modern slavery and labour exploitation risk will likely be encountered beyond Tier 1 supply, where visibility is difficult to obtain or manage. We are clear at point of acceptance and through on-going due diligence that all suppliers, irrespective of size or industry, must adopt and consistently apply our high standards to identify and address potential modern slavery risk within their own organisation and supply chains.
- ▶ **Fleet cleaning** – The UK hand car wash sector has been identified as an industry where workers are at risk of exploitation, ranging from poor and dangerous working conditions to modern day slavery. In managing our vehicle fleet, we need to ensure that our operations do not perpetuate this risk. How our vehicles are maintained is under review to provide the best possible guidance. Outcomes will include tools that remind users of the signs of exploitation, mapping of preferred providers to help informed choices about where services should be used, along with improved visibility of spend data to measure effectiveness and inform future improvements.
- ▶ **Construction** remains a high-risk sector within the UK. The nature of our operations expects close supervision and monitoring of construction activities to ensure the highest standards of health and safety. This close working relationship, training and regular awareness updates across the business helps to minimise the risk of modern slavery being evident on any site. Where no direct relationship exists with sub-tier suppliers, data is often limited, difficult to obtain and fragmented. Investment in data management will take advantage of emerging technologies and help to improve visibility once launched. Existing and future systems will have a continued reliance on Tier 1 collaboration to be effective however, reinforcing the need for maintaining a robust pre-qualification process to ensure that only appropriate, like-minded supply partners gain approval.

# Performance

## Progress

| Commitments in previous statement                                                                                                                                                                                                                                                                                                                                                                                   | Achievements in statement period                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ensure our pay scales exceed the Real Living Wage, while promoting the benefits of the standard through our Supplier Charter.                                                                                                                                                                                                                                                                                       | Colleagues pay scales and those of suppliers working permanently on our sites continue to exceed the levels set by the Real Living Wage Foundation. The standard is referenced through the Supplier Charter to help encourage all suppliers to consider adopting the standard. Improved retention, reduced training costs and greater employee satisfaction are real benefits that businesses can leverage while at the same time providing people with a wage that meets the cost of living. |
| Monitor best practice guidance supplied by the Home Office and through on-going consultation with the Slave-Free Alliance and other subscriptions.                                                                                                                                                                                                                                                                  | The latest Transparency in Supply Chains (TiSC) guidance prompted a review of our modern slavery activities. Support from the SFA included analysis of the 2025 statement from which to build action plans. A greater focus has been applied to transparency in this year's statement, providing improved detail where appropriate. A road map to full compliance is under development.                                                                                                       |
| Use the Government Modern Slavery Register as an additional compliance measure.                                                                                                                                                                                                                                                                                                                                     | The Register continues to provide insight into both supply chain and peer company activities towards modern slavery risk. The most recent statements of companies of interest are checked to understand where potential exists to further improve our processes of methods of communication.                                                                                                                                                                                                  |
| Supplier engagement – All contracted and procurement relevant suppliers will receive our Supplier Charter at least annually, outlining our ambitions and expectations for an ethical supply chain. Through the supplier approval process and future contract renewal, we aim to see all suppliers having confirmed acceptance of the Charter and to have appropriate measures in place to support its requirements. | The Charter was reviewed and updated in early 2026 to ensure its relevance to the subjects and legislation which are key to delivering our ambitions. The Charter was shared with suppliers earlier this year as part of the annual survey, where all suppliers are expected to accept its contents. To date, 94% of respondents have accepted the Charter.                                                                                                                                   |

Continued



| Commitments in previous statement                                                                                                                                                                                                                                                                                                                                                                               | Achievements in statement period                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Supplier modern slavery statements – Having an annual statement regardless of the legal requirement to produce one, demonstrates the seriousness by which a business considers modern slavery risk. We will continue to monitor the percentage of contracted suppliers publishing an annual statement as we see this as a key indicator of awareness and a proactive approach to mitigation.                    | Our annual survey asks suppliers to confirm whether a statement is published, compliance is tracked year on year and will become an input for the modern slavery risk register.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Due diligence of contracts – We are committed to checking a minimum of 10 modern slavery statements annually from suppliers who are required to publish under the Modern Slavery Act 2015.                                                                                                                                                                                                                      | Where heightened risk is identified, the supplier’s statement is checked to ensure for adequate consideration and awareness. All suppliers are asked to feedback annually on whether a statement is published, regardless of the legal requirement to do so. The number of statements being produced amongst respondents to our survey reached 71% in this period.                                                                                                                                                                                                                                                                                                                                              |
| Training – Ensure that all colleagues receive initial training, followed by on-going updates and notifications relating to human rights policy, and specifically modern slavery. We will continue to promote awareness throughout our business through online training for existing staff and appropriate induction for all new starters. We will mark Anti-Slavery Day with a week of internal communications. | Modern slavery training has been embedded in the colleague induction process to provide the best coverage of awareness. The e-learning modules developed in collaboration with the SFA remain relevant and up to date, giving an engaging method of providing colleagues with the tools to spot and manage risk. Currently, 94% of permanent colleagues have successfully completed the training. All company policies which potentially link to the subject are regularly reviewed and updated in line with changes to policy, business activity or legislation and are readily available for guidance. Anti-Slavery Day was marked on 18 October with a week of internal digital material and communications. |

Effectiveness

| Activity                                                          | Rationale                                                                                                                                                                                                                    | 2021-22 | 2022-23 | 2023-24 | 2024-25 | 2025-26 |
|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|---------|---------|---------|---------|
| Modern slavery calls to “Speaking up” – our whistleblowing policy | To provide easily accessed and, if required, confidential channels by which staff, clients and suppliers can raise concerns of modern slavery within our business.                                                           | 0       | 0       | 0       | 0       | 0       |
| % of suppliers acknowledging our Supplier Charter                 | The Charter helps to highlight the current and future topics of importance to Wales & West Utilities, enabling the supply chain to support our ambitions.                                                                    | 74%     | 74%     | 78%     | 63%     | 66%     |
| Number of modern slavery instances identified within our business | We measure supplier suitability through strict onboarding processes and an annual supplier feedback process.                                                                                                                 | 0       | 0       | 0       | 0       | 0       |
| Number of suppliers publishing an annual modern slavery statement | A statement can be a legal requirement (UK turnover >£36m), providing useful insight into supplier awareness. Responses remain voluntary which adversely affects results. A KPI is now applied to growing supplier adoption. | n/k     | 68%     | 73%     | 73%     | 71%     |

While we recognise that colleagues in certain functions and departments may have greater visibility of the red flags that indicate potential abuse, it remains everyone’s responsibility to prevent occurrences

To date, no concerns have been raised through the anonymous reporting channel, the Modern Slavery Working Group, or the Procurement team.

In the reporting period there were no confirmed incidents of modern slavery.



# Focus areas for 2026-27

## **Ensure our pay scales exceed the Real Living Wage, while promoting the benefits of the standard through our Supplier Charter.**

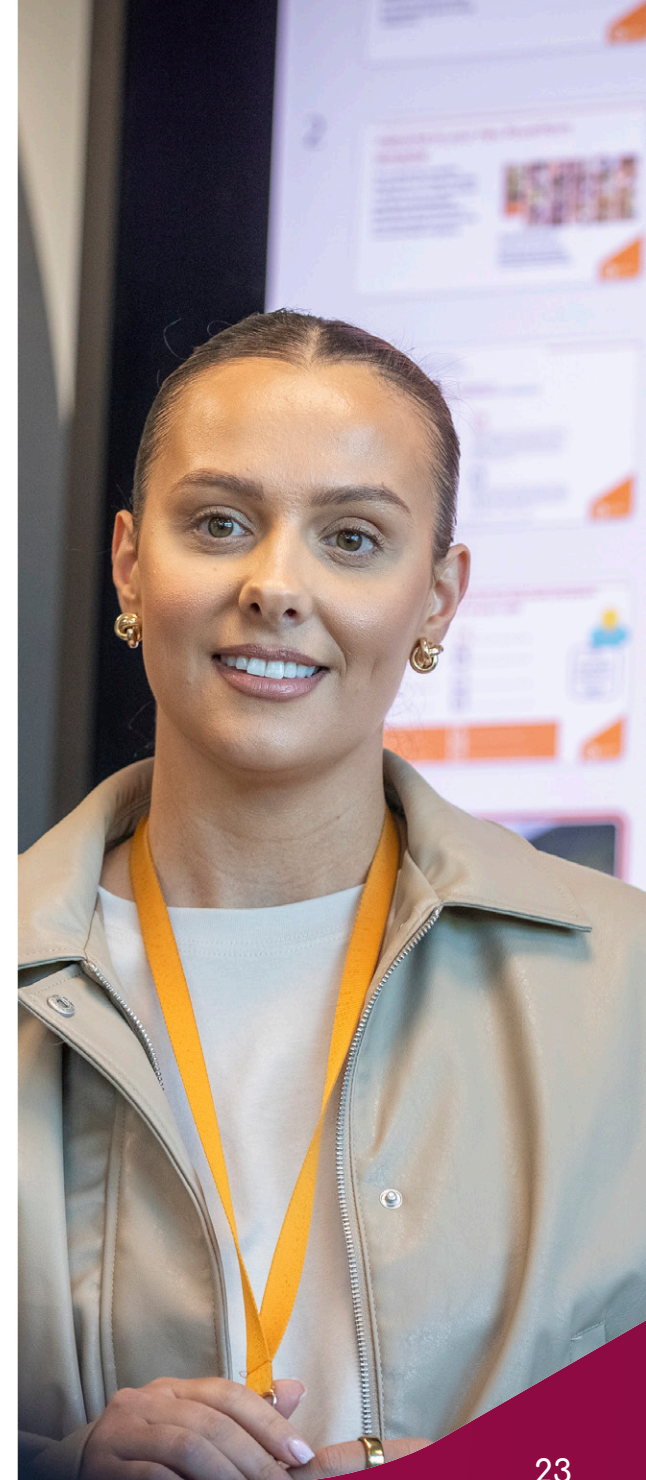
Colleagues' pay scales and those of suppliers working permanently on our sites continue to exceed the levels set by the Real Living Wage Foundation. The standard is referenced through the Charter to help encourage all suppliers to consider adoption. Improved retention, reduced training costs and greater employee satisfaction are real benefits that businesses can leverage while, at the same time, providing people with a wage that meets the cost of living.

## **Grow supplier engagement – Through the supplier approval process and future contract renewal, we aim see all suppliers having confirmed acceptance of the Charter and to have appropriate measures in place to support its requirements.**

The Charter was refreshed in early 2026 to ensure its relevance to the subjects and legislation which are key to delivering our ambitions before distribution across our supply chain in Spring 2026 as part of the annual survey. To date, 94% of respondents have confirmed acceptance. 2026 will see adaption to form a Code of Conduct, ahead of inclusion in future onboarding and contracts.

## **Continue due diligence of contracts – Monitor best practice guidance supplied by the Home Office, maintain on-going consultation with the Slave-Free Alliance and engagement in the Utilities Against Slavery working group. We are committed to checking a minimum of 10 modern slavery statements annually from suppliers who are required to publish under the Modern Slavery Act 2015.**

The Charter was refreshed in early 2026 to ensure its relevance to the subjects and legislation which are key to delivering our ambitions before distribution across our supply chain in Spring 2026 as part of the annual survey. To date, 94% of respondents have confirmed acceptance. 2026 will see adaption to form a Code of Conduct, ahead of inclusion in future onboarding and contracts.

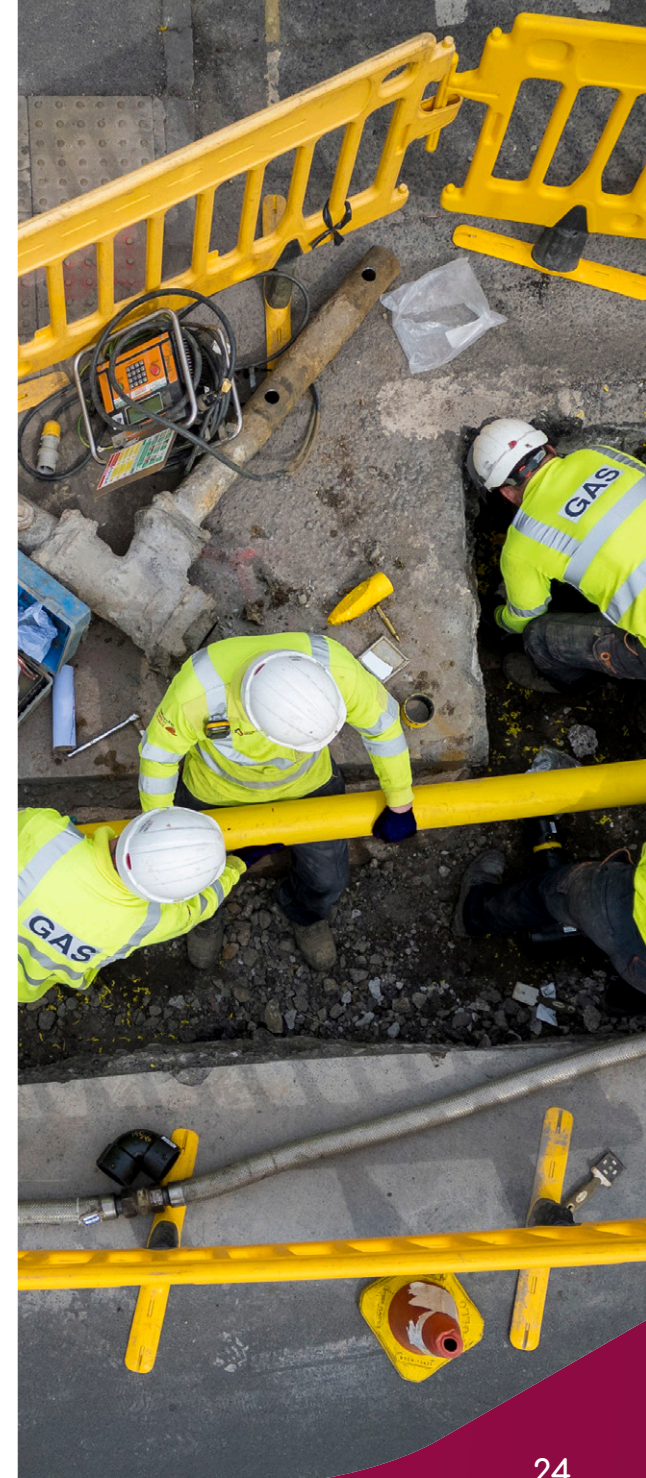


**Maintain training requirements** – Ensuring that all colleagues receive on-going updates and notifications relating to human rights policy, and specifically modern slavery. We will continue to promote awareness throughout our business through online training for existing staff and appropriate induction for all new starters. In addition, we will mark Anti-Slavery Day with a week of internal communications.

Modern slavery training is embedded in the colleague induction process to provide the best coverage of awareness. All company policies which potentially link to the subject will continue to be monitored and updated in line with changes to environment, business activity or legislation and made available for guidance.

### **GAP analysis of modern slavery activity.**

Slave-Free Alliance to assess and evaluate the potential exposure to modern slavery risk, helping to identify areas of good practice and present recommendations.



## Key Performance Indicators (KPIs)

A suite of KPIs will measure our progress across TiSC themes. Owners are responsible for setting goals, developing supporting action plans and tracking their implementation. Emerging data will measure the effectiveness of our approach.

| TiSC Pillar           | Objective                                                                           | Measure (quantitative /qualitative)                              | Baseline                                                                                                           | Target                                                                                       | Timeframe         | Owner       |
|-----------------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------|-------------|
| Risk Assessment       | Strengthen understanding of modern slavery risks across supply chain and operations | % of Tier 1 suppliers risk assessed; plan expansion into Tier 2  | Annual survey targets 100% procurement relevant suppliers through voluntary questionnaire (77% of spend responded) | 100% Tier 1 coverage (Procurement relevant); incremental expansion into Tier 2 supply chains | Annual            | Procurement |
| Supplier Transparency | Increase supplier awareness and accountability for modern slavery risks             | % of suppliers publishing modern slavery statement or equivalent | 71% of respondents publish a modern slavery statement                                                              | Year-on-year increase in % of suppliers publishing statements                                | Annually reported | Procurement |
| Due Diligence         | Strengthen supplier due diligence and compliance monitoring                         | Number of modern slavery statements reviewed annually            | Minimum of 10 supplier modern slavery statements reviewed annually                                                 | Maintain minimum threshold; increase based on risk prioritisation (MS risk register)         | Annual            | Procurement |

Continued



| TiSC Pillar                  | Objective                                                          | Measure (quantitative /qualitative)                    | Baseline                                                      | Target                                                                                    | Timeframe | Owner             |
|------------------------------|--------------------------------------------------------------------|--------------------------------------------------------|---------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------|-------------------|
| Gap Analysis and Improvement | Identify and close gaps in current processes, controls, and data   | Number of gaps identified and % closed                 | External benchmarking and internal review of annual statement | 100% of identified gaps assigned action plans; plan to close ahead of following statement | Annual    | MS Working Group  |
| Training and Awareness       | Ensure colleagues can identify and respond to modern slavery risks | 100% of colleagues completing training                 | 94% completion rate, 2026 to date                             | Achieve 100% completion; maintain annual awareness refresher (Anti-Slavery Week)          | Annual    | Training/HR       |
| Supplier Engagement          | Embed expectations and drive ethical practices across supply chain | % of suppliers acknowledging Supplier Charter          | 94% of respondents accepted the Supplier Charter              | Achieve 100% acknowledgement via onboarding/ renewal/ engagement                          | Annual    | Procurement       |
| Monitoring and Reporting     | Enhance transparency and continuous improvement                    | Annual KPI reporting and internal monitoring frequency | Quarterly working group, annual statement                     | External reporting with quarterly internal KPI tracking                                   | Annual    | MS Working Group. |

# Statement

## Statement on the prevention of slavery and human trafficking for Wales & West Utilities Limited

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Wales & West Utilities Limited slavery and human trafficking statement for the financial year ending 31 March 2026.

**This statement was approved by the Board of Directors on 7 July 2026**

**Name:** Graham Edwards

**Position:** Chief Executive Officer, Wales & West Utilities

**Signature:**

A handwritten signature in black ink, appearing to read 'Graham Edwards', with a large, stylized loop at the end.

**Date:** 7 July 2026

---

# Contact us

To find out more or to give us feedback on our statement, contact us at:  
**[procurementenquiries@wwutilities.co.uk](mailto:procurementenquiries@wwutilities.co.uk)**

To anonymously report a concern, contact Safecall at:  
freephone **0800 915 1571** at any time (24/7);  
Or via Safecall's website  
**[www.safecall.co.uk/file-a-rep](http://www.safecall.co.uk/file-a-rep)**



[wwutilities.co.uk](http://wwutilities.co.uk)



[wwutilities](https://www.facebook.com/wwutilities)



[@WWUtilities](https://www.instagram.com/WWUtilities)



[@WWUtilities](https://www.twitter.com/WWUtilities)



**WALES&WEST**  
UTILITIES