

Modern Slavery Statement

This statement is made on behalf of Water Plus Group Limited and its subsidiaries, Water Plus Limited and Water Plus Select Limited pursuant to section 54(1) of the Modern Slavery Act 2015 (the Act) and constitutes the Group's slavery and human trafficking statement for the period until 31st March 2022.

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 29% 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 Advanced Water Services such as leakage detection and repair, water audits, benchmarking, smart metering, contingency planning and emergency water supply.

Water Plus employs circa 550 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 Company Policies make clear to all employees what actions and behaviours are expected of our people.

Training is provided to all our people annually on our Whistleblowing Policy, Code of Conduct and Anti-Bribery and Corruption.

3. Our Supply Chain

Our supply chain is reliant on around 180 suppliers with the majority predominantly 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, water efficiency experts and other value added service providers.
- 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. Around 98% of our supply chain is based within the UK, equating to more than 99% of our total spend, with some back office activity provided from by our service provider in India. 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, and while we work collaboratively with them, we also 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.

5. Training for our People

To date no training has been provided on the risks of modern slavery within our business relationships, however there are some key managers that have an understanding of these to identify and develop preventative measures. Both awareness of our obligations and training are to be provided to employees in the current year (see further below).

Online training is provided for:

- Code of Conduct (includes discrimination and ethical trading)
- Anti-Bribery & Corruption
- Whistleblowing

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 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 recrimination.

7. Actions taken in financial year ended March 2021

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

- Introduced arrangements to obtain policy documentation and assurance from suppliers that arrangements exist to prevent modern day slavery within their businesses.

8. Actions identified to be taken in the forthcoming financial year (FY 2021/22)

The following steps have been identified to be performed in the current financial year to promote awareness of our anti-slavery and human trafficking arrangements:

- Employee training: Develop online learning for designated employees of our obligations and arrangements in relation to modern day slavery and human trafficking. Provide internal communications to all employees to raise awareness of our arrangements in addressing modern day slavery.
- Temporary and agency workers: Develop and introduce service terms with recruitment agencies to more clearly define responsibilities around completion of regulated employment checks by agencies.
- Supplier due diligence: Continue to obtain documentation from suppliers confirming compliance of their modern day slavery and human trafficking obligations.
- Standard terms and conditions: Ensure our Standard terms and conditions for the supply of goods and services includes reference to modern day slavery compliance and that these are provided to those suppliers we engage that are not on bespoke contracts.



Andy Hughes

Chief Executive Officer

Water Plus Group Limited and its subsidiaries, Water Plus Limited and Water Plus Select Limited

28 July 2021