

Modern Slavery Report

for 2019/2020

KeldaGroup



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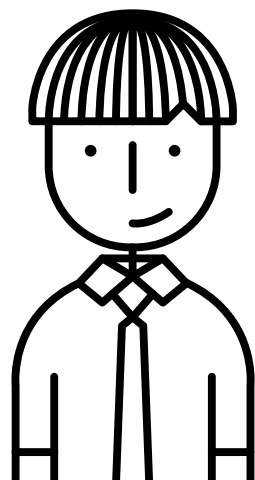
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1. Board Statement

Section 1

Modern Slavery Statement

Modern slavery is a serious crime that is happening across the world, including the UK. Victims are often targeted and abused by criminals. Slavery can happen in many forms, through the trafficking of people, to forced labour. At Kelda we put people at the heart of everything we do, and we understand we must do more to help eradicate this issue.

Kelda recognises that modern slavery poses a risk to our business and stakeholders and we cannot be complacent. We strongly oppose any form of slavery or human trafficking activity within our business and that extends to our supply chain.

We are committed to raising awareness of this issue across our business and supply chain and strengthening our processes to help us identify and action any activity that is not in line with our standards.



Kathy Smith,
Company Secretary

Signed and approved by the Board of
Kelda Holdings on 23 September 2020



2. About Us

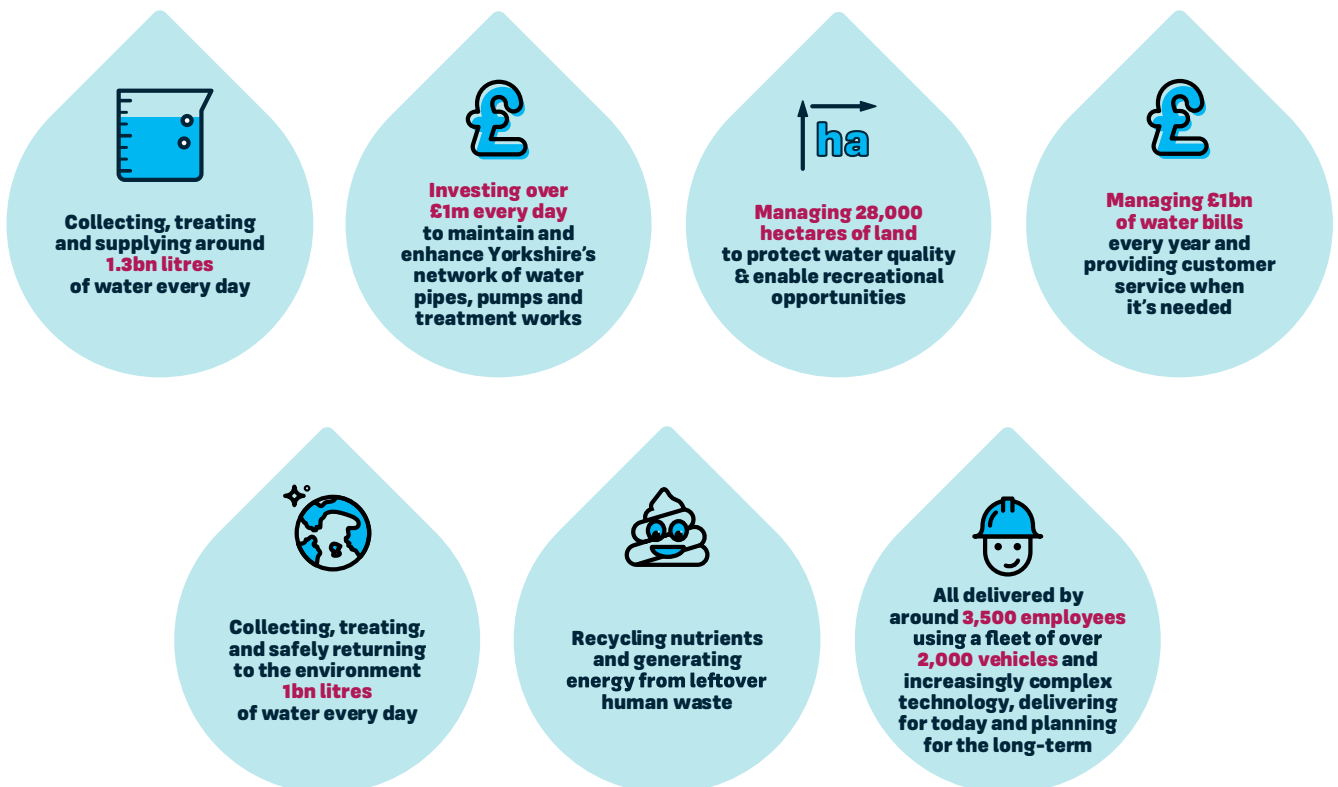
Section 2

About Us

Yorkshire Water is the main subsidiary of the Kelda Group and is one of 11 regulated water and wastewater businesses in England and Wales, employing over 3,500 employees to support providing essential water and wastewater services to around five million people and 140,000 businesses in the Yorkshire and Humberside region. We are proud to play water's role in making Yorkshire a brilliant place to be – now and always.

In 2020, we launched our big ambition to put people at the heart of what we do, so tackling the challenges that Modern Slavery brings really does link into our strategy. We are always learning and understanding about how we can do more in our approach to minimise the risk to our business and through collaborating with others we understand we are better together in working through the challenges that Modern Slavery brings to our industry.

During 2019/20 Yorkshire Water joined the newly formed Utility Working Group that brings together other UK water companies, wider utilities and The Slave Free Alliance. Although the group is newly formed the aim is to provide a layer of assurance to industry through working on targeted areas collaboratively and sharing best practice and learning to support our own plans.



3. Our Supply Chain

Section 3

Our Supply Chain

Yorkshire Water operates solely within the UK and whilst we purchase a large proportion of our goods and services locally, many of our supply chains extend throughout the world. Each year we spend over £700M through our supply chains, utilising over 1,300 suppliers to keep Yorkshire's water flowing. Our supply chains are complex, we procure a wide variety of goods and services across the business, ranging from services from small local suppliers through to capital projects from large multi-national organisations.

Yorkshire Water supplier contracts specifically reference compliance with the Modern Slavery Act 2015 and include an associated right to audit.

During the 2019/20 financial year we have continued meeting our supply chain commitments on slavery and human trafficking by continuing with the following steps:

- Our Sourcing & Contract Management team handle all our procurement and they carry out individual procurement risk assessments to identify potential risks relating to Modern Slavery and put extra contractual obligations in place if the risk assessment indicates this may be needed
- We have continued to include specific pass or fail criteria linked to obligations under the Modern Slavery Act 2015 for all procurement-led tender processes and new vendor requests.

Building on our previous work in this area, in financial year 2020/21 we commit to the following steps:

- Refreshing our supply chain risk assessment to ensure an up-to-date position is in place to educate our assurance work;
- Seeking additional assurance of ethical working practices in areas of our supply chain that we have highlighted as being at higher risk through direct monitoring; and
- Utilising the experience of the assurance activities undertaken to create an annual assurance programme under-pinned by audit activity.



4. Our Policies

Section 4

Our Policies

Yorkshire Water has a suite of policies and procedures available to all colleagues in the company, which have been reviewed and updated to consider the Modern Slavery Act 2015.

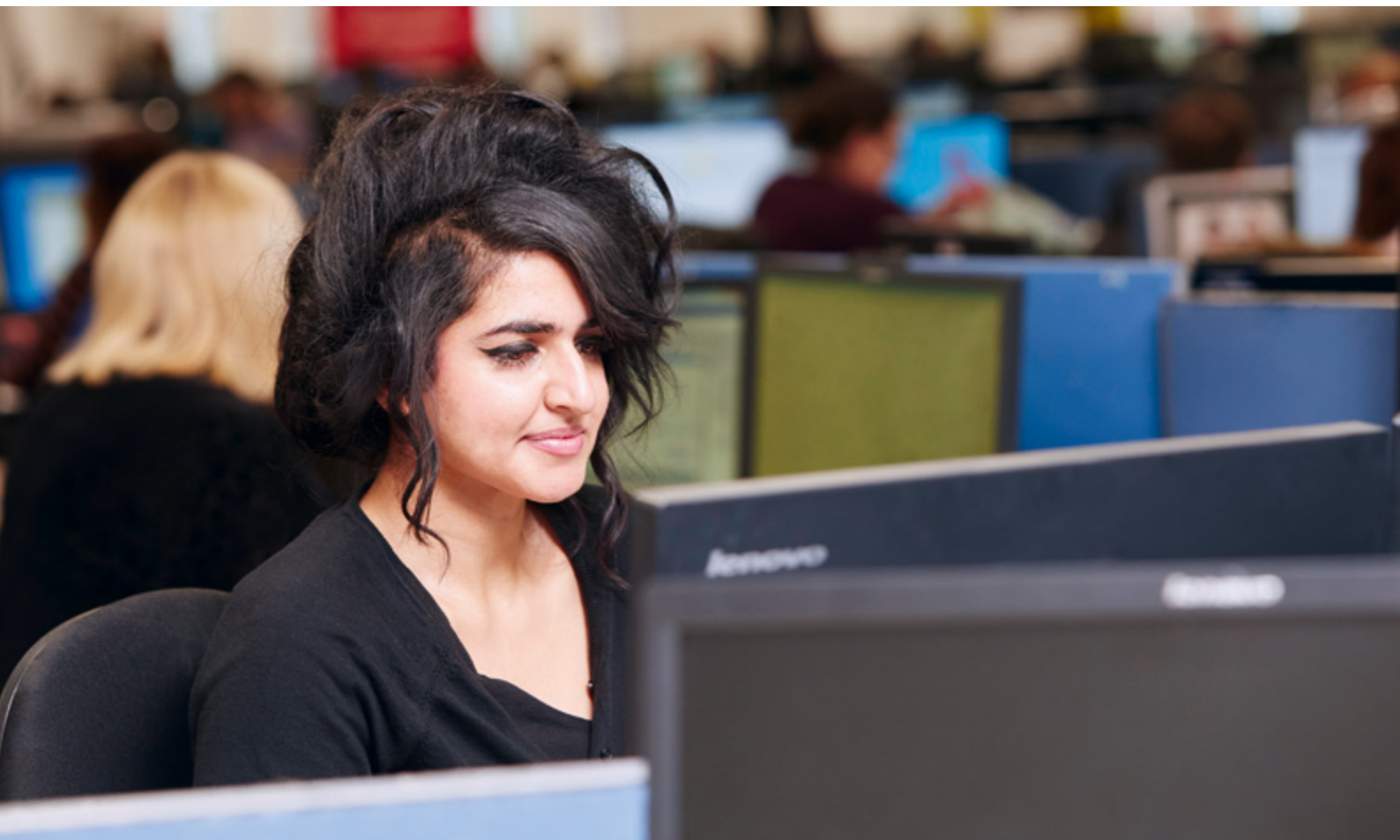
All colleagues are expected to be familiar with, and to comply with, our **Code of Ethics**. This covers the standards and behaviours that we expect from our people and the way in which we want to do business.

Yorkshire Water has an employee guidance document on **human trafficking, modern slavery and forced marriage**, to ensure our colleagues have access to the information and support they need. This guidance is underpinned by our:

- **Human Rights Policy** - recognising international human rights as set out in the Bill of Human Rights and the principles described in the UN Global Compact
- **'Speak up' Whistleblowing Policy** - refreshed and rolled out company wide during 2019/20, this aims to encourage all colleagues and contractors to 'speak up' and raise matters of serious concern including any ethical or moral issues in any part of our business.

The Kelda Group, of which Yorkshire Water is part, has a **Living Wage accreditation**, which means that we ensure all direct employees are paid a wage that is over and above the statutory wage levels set by the UK government.

We also include a Living Wage clause in all our supplier contracts, to ensure that qualifying contractors also receive at least the Living Wage, including where working for a subcontractor. Any breach of these clauses can lead to termination of the contract.



5. Measuring our progress

Section 5

Measuring our progress

We understand we cannot be complacent when it comes to our commitments around Modern Slavery. We've already started monitoring some Key Performance Indicators but during 2020 we plan to establish a Modern Slavery Steering Group that will review these measures and monitor the progress we are making to positively impact Modern Slavery. This will provide visibility and help us act in the right areas.

2019/20 Stats



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