

# Modern Slavery Statement

For the year ended 31 March 2025



Published August 2025

# How to view this document

## Contents page

Our contents page links to every section within this document. Clicking on a specific section will instantly take you to it.

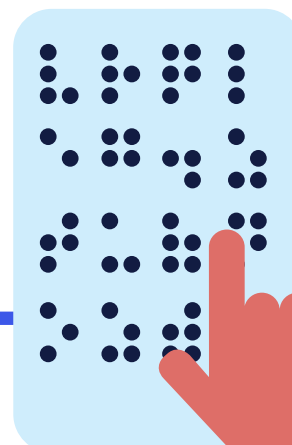
- 1 Click on the contents button to return to the contents page.
- 2 This button takes you to the previous page.
- 3 This button takes you to the next page.

There are also many other clickable links within this document which we've made easy to spot by underlining and **highlighting** them in blue.

## Accessibility matters. It's really important that everyone can navigate and understand our Modern Slavery Statement, and what it means for them.

To help with this, we've taken steps to make sure this document supports accessibility needs:

- Screen readers will recite content in a logical order, as well as spotting headers and using different text for images.
- Compatible with text-to-speech programmes and Braille displays.
- Easy navigation with contents table and bookmarked links.
- Simple text structure with clear headings, paragraphs and tables.
- Comfortable colour contrasts.



# Contents

We've created colour-coded sections to help you to navigate this report easily. Just click on the section you are interested in on the contents page, and it will navigate you to that section.

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# Board statement

## I'm pleased to introduce Yorkshire Water's Modern Slavery Statement for the year ended 31 March 2025.

This statement explains the steps we've taken over the past year to prevent modern slavery taking place in our business and supply chain. It also includes a summary of how we did against our annual targets.

We recognise that modern slavery is a growing issue and that we have an important role in helping to eradicate it. We're committed to leaning into this challenge by remaining vigilant to modern slavery risks within our business and supply chain.

Over the year we've raised awareness of modern slavery across Yorkshire Water, tailoring messages and content to make sure we engage at the right level with the right colleagues. We've also continued our programme of ethical employment audits to improve our knowledge of higher risk suppliers and ensure they are working in line with our standards and expectations.

Working with others remains an important step in our approach to addressing modern slavery. As proud members of Utilities Against Slavery, we're collaborating with other organisations to develop a coordinated, sector-specific approach that drives real change across the utilities sector.

We're committed to treating everyone in our business and supply chain fairly. We've made good steps over the last year but will continue to strengthen our approach further as we strive for a world where modern slavery doesn't exist.

A handwritten signature in black ink that reads "Vanda Murray".

**Vanda Murray OBE**  
**Chair**

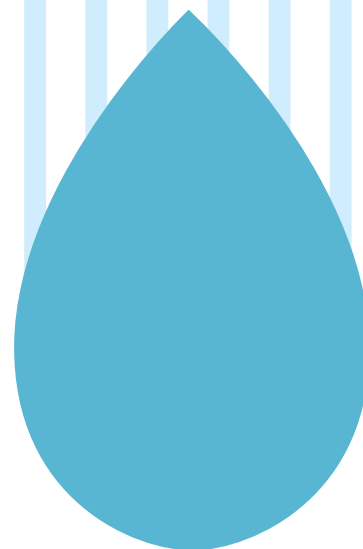
Signed and approved by the Board of  
Yorkshire Water Services Limited on 9 July 2025

# About Yorkshire Water and our supply chain



**Yorkshire Water is a subsidiary of Kelda Holdings Limited and we're one of 11 regulated water and wastewater businesses in England and Wales. We supply some of life's most essential services to the people and businesses of Yorkshire and the Humber, playing a key role in the region's health, wellbeing, and prosperity.**

We do this by supplying water and wastewater services to over 5 million people and 140,000 business properties, as well as being custodians of essential infrastructure and the natural environment.



We supply **1.3 billion litres** of fresh water every day, which is more than 500 Olympic-sized swimming pools.



We invest **£2.1m every day** to maintain and enhance our network of pipes, pumps and treatment works.



We serve **5.5m individual customers**, in 2.3m homes and 145,000 businesses.



We manage **32,000km** of clean water pipes and **53,000km** of sewer network.



We collect, treat and return to the environment **1.9 billion litres** of wastewater and rainwater every day.



We employ **4,000 colleagues** and our latest investment programme supports a further 8,000 jobs across our suppliers.



We supply **essential services** to 65 hospitals, 12 universities and 2,500 schools and colleges.



We're proud to be a **Real Living Wage employer**.

Find out more about what we do here:  
[yorkshirewater.com/about-us/what-we-do/making-yorkshire-brilliant/](https://yorkshirewater.com/about-us/what-we-do/making-yorkshire-brilliant/)

## Our supply chain is large and complex. Last year we spent £1.3bn across more than 1,100 suppliers, which range from small, local businesses to large multi-national companies.

We continue to be a proud member of Utilities Against Slavery, a collaborative forum for energy, water, and gas providers in the UK with the goal of eradicating modern slavery from the utilities sector.

Utilities Against Slavery is facilitated by the Slave-Free Alliance, a social enterprise supporting organisations to protect their operations, supply chains and people from modern slavery and labour exploitation.

**“As an inaugural and influential member of Utilities Against Slavery, Yorkshire Water are pivotal in leading the group’s engagement and collaboration to drive meaningful change within the utilities sector”**

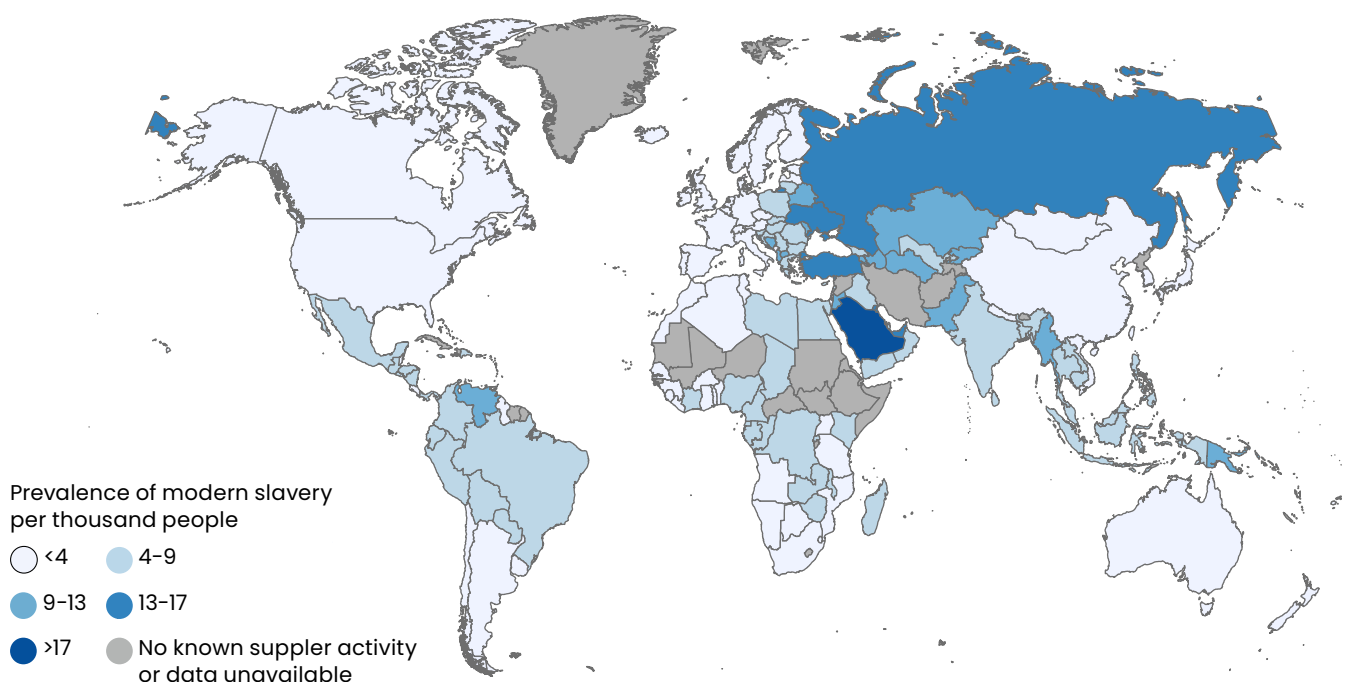
**Gary Booth**

Independent Chair of Utilities Against Slavery

Over the last year, through our membership we’ve continued to lead an engagement working group for the wider utility sector. The working group aims to increase awareness of modern slavery risks, promote collaborative working and the strategic areas of focus for the wider group through video briefings and events.

In October 2024, during Anti-Slavery Week, the group hosted an online event for procurement and commercial specialists. Representatives from utility companies across the UK came together to discuss common challenges, areas for improvement and best practice in addressing modern slavery in supply chains. The event has led to further actions and activity to strengthen the sectors approach to tackling modern slavery.

We’re also a partner member of the Supply Chain Sustainability School, which provides access to online learning and workshops that we promote to colleagues across our business to encourage topic-specific learning around modern slavery.



Modern slavery prevalence in countries where our first-tier suppliers are known to have operational activities. Note that the multi-national nature of some suppliers means that the presence of a supplier in any given country does not necessarily imply Yorkshire Water receives goods or services from that location. (Data sources: internal records; online research; Walk Free Global Slavery Index 2023).

# Our policies

**Yorkshire Water's Modern Slavery Policy applies to all our colleagues and extends to anyone working on our sites, regardless of their employer. It sets out our stance on modern slavery and explains how we'll address incidents of modern slavery within our business.**

We expect our colleagues and supply chain to be vigilant in recognising and reporting signs of modern slavery and our Modern Slavery Policy gives guidance and support on this.

Our Modern Slavery Policy is supported by our Code of Ethics, which reinforces the need to do the right thing by emphasising the behaviours and high standards we expect from everyone working at Yorkshire Water both directly as a colleague and indirectly as a partner.

**Other policies that underpin our Modern Slavery Policy include our:**

- Human Rights Policy, which recognises international human rights as set out in the Bill of Human Rights and the principles described in the United Nations Global Compact.
- 'Speak Up' Whistleblowing Policy, which offers a confidential reporting mechanism for anyone to report matters of concern, including ethical and moral issues.
- Supply Chain Policy, which details the steps to be taken to assess potential suppliers against a range of risks including ethical risks.
- Health and Safety Policy which embeds physical, mental, and wellbeing of colleagues as well as ensuring a commitment to acting on safeguarding concerns.



# Risk assessment and management

**We've assessed the risks of modern slavery within our organisation and across our supply chain to make sure we focus on the areas where we can have the greatest impact, based on the level of inherent risk and our ability to influence and manage each area.**

Risk monitoring is led by our Modern Slavery Working Group, which comprises colleagues from across Yorkshire Water including our Sustainable Business, Commercial Risk, HR and Legal functions. The Group takes a collaborative, cross-business approach to tackle modern slavery risks, and reports to the Company Secretary.

Our Modern Slavery Working Group ensures we're working in line with all legislative requirements, and we carry out regular scans to make sure we remain compliant.

Our risk mitigation activities are centred largely on our capital delivery partners and other first tier suppliers that we've identified as higher risk due to the nature of the services they provide.

We also recognise that the risk of modern slavery may increase further down our supply chain (tiers 2 and below), where we've lower visibility and generally lower ability to influence. In future, we will seek to work with our direct suppliers to gain more detailed insights into modern slavery risks in the lower tiers of our supply chain and understand how these can be managed effectively.

Area	Degree of control	Risk controls in place	Residual modern slavery risk
<b>Direct employees</b>	High	Recruitment and management policies and procedures; training courses; awareness raising.	Lower
<b>Agency workers</b>	High	Recruitment policies and procedures.	
<b>Tier 1 suppliers of goods and services, including capital delivery partners</b>	Medium	Tender questions and evaluation processes; engagement with suppliers; supplier audit programme; supplier training events.	
<b>Tier 2 suppliers and below (i.e. suppliers or subcontractors for higher tier suppliers)</b>	Low	Indirect influence via Tier 1 suppliers.	Higher

# Our supply chain

**Over the last year we've continued to strengthen our approach to reducing the risk of modern slavery in our supply chain.**

This includes activities such as:

- Improving the information we hold on our suppliers through the use of third-party verification and accreditation services.
- Ensuring all our suppliers are aware of our expectations and requirements regarding modern slavery, as set out in our **Sustainable Procurement Code**.
- Conducting pre-qualification due diligence to assess new suppliers' knowledge of and compliance with the Modern Slavery Act 2015.
- Carrying out enhanced due diligence checks for higher risk tenders.
- Using third-party datasets to build detailed insights into the risk of modern slavery by commodity and geography across our supply chain, allowing us to target our activities towards higher risk categories.

## 20 ethical employment audits completed for higher risk suppliers.

In addition to this, over the last year we've audited 20 of our suppliers through a third-party specialist. Suppliers were picked for audit through assessing the products and services they provide for modern slavery risk alongside assessing spend. The results of the audit identified some key areas for improvement including how our suppliers engage with their supply chain and ensuring Right to Work checks are carried out in line with Home Office guidance. We'll promote learning pathways through the Supply Chain Sustainability School to help our suppliers address these areas and strengthen their approach, reducing risks in their organisation and ours.

Our next regulatory business cycle between 2025 and 2030 will see our largest ever investment programme to address social, environmental and infrastructure challenges facing our region. We know that the accompanying increase in supply chain activity carries potential modern slavery risks for our organisation and across the wider water sector. That's why we're working together with suppliers, other water companies, specialist organisations and other interested parties to raise awareness of modern slavery risks and develop sector-wide mitigation approaches to this challenge.



# Colleague training and awareness

**Modern slavery is included in our Code of Ethics and Safeguarding training courses, which both focus on spotting the signs of slavery and forced labour and understanding how to report them. These courses are mandatory for all colleagues and completion rates are tracked by senior management on a regular basis.**

Through our membership of the Supply Chain Sustainability School, colleagues have access to online learning courses to enhance their knowledge and understanding. This includes specialist courses for colleagues in particular roles, such as those in our procurement and capital delivery functions. Over the last year, we've worked with the Supply Chain Sustainability School to create targeted learning pathways to make it easier for colleagues to access courses relevant to their roles.

**More than 90% of our colleagues have completed modern slavery awareness training.**

In January 2025 we held a workshop with the Supply Chain Sustainability School for colleagues in our Procurement and Contract Management teams. The workshop focussed on using procurement and supply chain management to combat modern slavery. As a follow-on to the workshop, attendees were encouraged to complete additional learning pathways to further develop their knowledge of modern slavery.

During Anti-Slavery Week in October 2024, we ran an internal communication campaign to raise awareness of the issues of modern slavery across Yorkshire Water. This included information about spotting the signs and how colleagues can play their part in helping combat modern slavery by reporting concerns.

## Over 600 field operations colleagues targeted in our latest modern slavery awareness campaign.

In March 2025 our Transport and Fleet team ran a colleague awareness campaign through our fleet management mobile app, targeting over 600 colleagues in field operations roles. Following the campaign, 87% of targeted colleagues reported an increase in their awareness of modern slavery risks.



# Measuring our progress



**We've established Key Performance Indicators (KPIs) to allow us to monitor and report on the effectiveness of our actions to mitigate the risk of modern slavery.**

In the table below, we give an overview of our performance for each KPI over the past year, as well as further supporting commentary.

Focus	KPI	Target	Performance	Further details
Internal	Incidents of suspected modern slavery reported within Yorkshire Water's own operations.	n/a*	0	This year there have been no incidents of modern slavery reported in Yorkshire Water's own operations through our Speak Up whistleblowing hotline or any other internal communication channels.
	Colleagues who've completed basic training relevant to modern slavery identification and prevention.	100%	91%	91% of our colleagues have completed our Code of Ethics training, which includes a dedicated section on how to identify, report and help stop modern slavery from happening.
	Colleagues who've completed enhanced training in modern slavery identification and prevention.	10	11	Within the past year, 11 colleagues from our Procurement, Contract Management, and Sustainability teams have completed enhanced training in modern slavery identification and prevention through completion of relevant courses and workshops provided by the Supply Chain Sustainability School.
External	Incidents of modern slavery identified in our supply chain.	n/a*	0	This year, no incidents of modern slavery within our supply chain have been reported to us by suppliers as part of their contractual obligations and no incidents have been identified through other channels.
	Third party ethical employment audits of our priority suppliers.	20	20	This year, we have completed ethical employment audits of 20 of our priority suppliers.

\* We aim for a world where modern slavery doesn't exist. However, we haven't set targets for these KPIs because we don't think it's right to incentivise colleagues to under-report suspected incidents of modern slavery within our organisation or supply chain.

# Next year's KPIs

Focus	KPI	Unit	Target	Definition
Internal	Incidents of suspected modern slavery reported within Yorkshire Water's own operations.	Number	n/a*	The total number of incidents of modern slavery reported within Yorkshire Water's own operations, including both confirmed incidents and incidents that were reported and on investigation proved to be unsubstantiated.
	Colleagues who've completed basic training relevant to modern slavery identification and prevention.	%	100%	The percentage of currently employed colleagues who've completed our Code of Ethics training, which includes information on modern slavery.
	Colleagues who've completed enhanced training in modern slavery identification and prevention.	Number	10	The number of colleagues employed by Yorkshire Water at year-end who've completed enhanced modern slavery training relevant to their area of the business within the year. Enhanced training may include, for example, supply chain risk management for procurement colleagues and enhanced identification training for operational colleagues.
External	Incidents of modern slavery identified in our supply chain.	Number	n/a*	The number of confirmed incidents of modern slavery identified in our supply chain, based on incidents reported by our suppliers and also from information gathered from wider monitoring (e.g. media reports; due diligence checks).
	Third party ethical employment audits of our priority suppliers.	Number	20	The number of ethical employment audits of our priority suppliers carried out by a specialist third party on our behalf.

\* We aim for a world where modern slavery doesn't exist. However, we haven't set targets for these KPIs because we don't think it's right to incentivise colleagues to under-report suspected incidents of modern slavery within our organisation or supply chain.

# Future areas of focus

Over the next year we'll take a continuous improvement approach to address the risks of modern slavery in our organisation and supply chain, building on the work and activities we've completed to date.

## Supply chain engagement and visibility



We'll continue to engage with our supply chain, focussing in particular on areas for improvement highlighted through our Ethical Employment Audit findings. Using learning pathways created through the Supply Chain Sustainability School we'll promote best practice and further resources to develop our resilience to modern slavery.

We'll conduct more audits of our suppliers, focussing on those we have identified as being higher risk.

Through our membership of Utilities Against Slavery and the Supply Chain Sustainability School we'll continue to engage with suppliers through events and workshops.

## Colleague training and development



We'll continue to provide modern slavery training to all colleagues. Using our partnership with the Supply Chain Sustainability School, we'll promote additional learning and development for colleagues in relevant roles. We'll continue to develop our programme of engagement for colleagues, including linking in with Anti-Slavery Week and holding interactive awareness raising sessions for our colleagues and suppliers.

## Strengthening due diligence



We'll continue to work and engage with colleagues across the business to enhance our approach to modern slavery prevention and mitigation. We'll also explore the use of new technologies, such as AI, to help identify and manage modern slavery risks in our organisation and supply chain.

## Collaborative working



Through our ongoing engagement with Utilities Against Slavery, we'll continue to work towards a united approach to modern slavery risk management across the utility sector. Over the next year, the group will continue to create and share best practice and guidance and look to promote events and united messaging across the industry.

## Improving our approach to reporting



Following the recent release of updated Home Office guidance on modern slavery, we'll be reviewing our approach to reporting and developing action plans to ensure we remain aligned with best practice in this area.

# Thank you for reading



Yorkshire Water Services Limited,  
Western House, Halifax Road, Bradford, BD6 2SZ.  
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