

Modern Slavery Policy

***This is a hybrid document that combines the Yorkshire Water policy and the associated procedures for how this policy should be followed. Policies and procedures are mandatory.**

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2				

Business areas affected by this document

This applies to all colleagues, both direct and indirect, when working for a company within Kelda Holdings.

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1. Introduction

Modern slavery is a humanitarian crime. At Yorkshire Water, we have zero tolerance for any form of modern slavery activity within our business and supply chain and are fully committed to playing our part in helping eradicate it.

This document outlines our policy on modern slavery and our expectations of colleagues when dealing with incidents and suspicions of modern slavery. It also sets out how we will respond and act upon any reports and how we manage the risk of modern slavery within our business and supply chain.

This policy applies to all colleagues, both direct and indirect, when working for a company within the Kelda group.

2. Our policy on modern slavery

Yorkshire Water does not permit, condone, or otherwise accept any form of slavery, either by its colleagues, subcontractors, contractors, suppliers, agents, partners or any organisation, entity, body, business or individual with whom Yorkshire Water engages or does business (Associated Party). We are fully committed to working collaboratively with our suppliers and other organisations to identify and minimise modern slavery risks.

We all have a responsibility to be alert to the risks of modern slavery, however small these might be in our business and our wider supply chain.

3. Policy and Procedure requirements

3.1. Internal procedures

Through the actions set out in our Modern Slavery Statement, which is published on our [website](#), we are committed to tackling the risk of modern slavery in our activities and through collaborative working we play our part in helping to prevent modern slavery within our business.

Yorkshire Water's Modern Slavery Working Group, encompassing representatives from Sustainability, Commercial Assurance and Legal, drives progress towards eradicating modern slavery from our business and is responsible for producing our annual Modern Slavery Statement.

We will ensure this policy is embedded and well understood by our colleagues, contractors, suppliers and stakeholders.

3.2. Supply chain procedures

We expect our contractors and suppliers, including sub-contractors, to be aware of and compliant with the Modern Slavery Act 2015 and report any incidents of modern slavery within their organisation. Our supplier contracts emphasise, where relevant, the requirement for compliance with the Modern Slavery Act 2015 and include an associated right to audit.

Organisations that have a turnover over £36m are required by law to publish a Modern Slavery Statement setting their approach to how they will manage modern slavery in their organisation and supply chain. Although there is no similar requirement for organisations that have a turnover below the £36m threshold, we nonetheless encourage our suppliers to be open about their policies

and procedures in relation to modern slavery and their approach to tackling any issues they may face proportionate to their business.

We take a risk-based approach to our annual programme of modern slavery due diligence across our supply chain. We expect suppliers to be transparent and engage meaningfully with requests for information in relation to modern slavery. We also expect our contractors and suppliers to act upon recommendations to improve their policies and procedures in relation to reducing their risks of modern slavery.

3.3. Colleague responsibilities

We expect all colleagues to be vigilant in looking out for the signs of modern slavery and taking appropriate action.

3.3.1. Awareness

Modern slavery can be difficult to identify but there are some common indicators to look for that you should be alert to, such as:

- a reluctance to talk, especially to strangers and authorities
- acting afraid, anxious and being unable to make eye contact
- appearing to be under the control of someone else or keeping to themselves
- not having any personal identification (this is sometimes kept by their captors as means of coercion)
- wearing the same clothes every day or looking generally unkempt
- sticking to a routine and not doing anything outside of their work, being unable to move around freely
- appearing frightened and withdrawn and showing signs of physical or psychological abuse
- getting dropped off and picked up from work at unusual times, e.g., very early in the morning or late at night
- working long hours, wearing unsuitable clothing such as inappropriate or inadequate PPE, and having the wrong equipment for their job

You may also notice that rights are being violated, including misinformation surrounding contract details, being forced to work overtime, being underpaid, or having wages docked illegally and/or unfairly.

3.3.2 Reporting

If you suspect that an instance of modern slavery is taking place within our business or supply chain, you should report your concerns by following the guidance below:

- Speak to your manager and/or HR Policy and Case Team about concerns relating to modern slavery within Yorkshire Water's operations or supply chain
- If your concern relates directly to Yorkshire Water operations and you are not comfortable speaking to your manager and/or HR Policy and Case Team, contact can be made to the Speaking Up Hotline (as detailed in our Speaking Up Policy) or directly to the police or Modern Slavery Helpline as detailed in Section 3.5
- If the affected person(s) is in immediate danger call 999
- Refer to the Speaking Up Policy located on the Hive for details of how to report any other concerns/suspensions
- Refer to the Code of Ethics for guidance on making the right ethical choices and what to do if your honesty and integrity is challenged

If you suspect that an instance of modern slavery is taking place outside Yorkshire Water or our supply chain, you should report your concerns to the Modern Slavery Helpline (as detailed in section 3.5) or call the police on 999 if the person is in immediate danger.

3.4. Management response

If there are suspicions of slavery or forced labour taking place within any part of Yorkshire Water or by an Associated Party, Yorkshire Water reserves the right to:

- Report such suspicions and provide appropriate information to the relevant authorities
- Suspend or terminate any associated engagement, business arrangement or contract should action and improvements to address the issue of modern slavery not be immediately implemented

Once suspicions have been reported to your manager and/or HR Policy and Case Team, the relevant person will maintain regular contact with the person affected (if appropriate) and offer any support required. The suspicion will be reported to the police and/or the Modern Slavery Helpline, either by the affected person/party or by Yorkshire Water management.

3.5. Useful contacts

- HR Policy and Case: hr.policyandcase@yorkshirewater.co.uk or raise a Policy and Case SAM ticket
- Speaking Up Hotline: 0800 915 1571
- Police: 999 for emergencies or 101 if not urgent
- Modern Slavery Hotline: 0800 0121 700

For general enquiries about this policy and our approach to modern slavery please contact the sustainability team: sustainability@yorkshirewater.co.uk

4. Definitions

Definitions of Terms Used:

Yorkshire Water	Yorkshire Water is used in this document to refer to Yorkshire Water Services Limited and all other subsidiary companies within the Kelda group
Associated Parties	Colleagues, subcontractors, contractors, suppliers, agents, partners or any organisation, entity, body, business or individual with whom Yorkshire Water engages or does business
Modern slavery	The illegal exploitation of people for personal or commercial gain

5. Compliance with this document

Colleagues shall comply with the requirements of this document, in line with the company Conduct Policy.

6. Assurance

Regular monitoring of compliance with these requirements shall be undertaken by the assurance providers documented as part of the Assurance Framework.

Yorkshire Water's Company Secretary is responsible for ensuring compliance with the policy. The Company Secretary is supported by the Modern Slavery Working Group who monitor compliance through reviews of our approach to reducing the risk of modern slavery and monitoring of the performance indicators and areas of focus as detailed in our annual Modern Slavery Statement.

7. Related Documents

7.1 Strategies/Standards/Procedures/Guidance

Document Title	Location
Speaking Up Policy	Available through the Hive
Code of Ethics	Available through the Hive
Modern Slavery Statement	Available through the Yorkshire Water website
Human Rights Policy	Available through the Hive
Conduct Policy	Available through HR online