



## **VEOLIA WATER SYSTEMS (VWS) UK LTD & ONDEO INDUSTRIAL SOLUTIONS UK LTD**

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

#### **INTRODUCTION**

This statement sets out the actions Veolia Water Systems (VWS) UK Ltd and Ondeo Industrial Solutions UK Ltd has in place to understand all potential modern slavery risks to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within its own business and supply chains. This statement is made in accordance with Section 54 (1) of the Modern Slavery Act 2015 and details actions which we continue to take to identify and combat the risk of modern slavery occurring in our business activities or supply chains.

This statement sets out the measures that Veolia Water Systems (VWS) UK Ltd and Ondeo Industrial Solutions UK Ltd plans to implement in the UK for the year 1 January 2026 to 31 December 2026 and the actions we have taken during the previous twelve month period to 31 December 2025.

Veolia Water Systems (VWS) UK Ltd and Ondeo Industrial Solutions UK Ltd recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The company is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring our supply chains are free from slavery and human trafficking.

#### **COMPANIES COVERED BY THIS STATEMENT**

The following companies are covered by this statement:

- Veolia Water Systems (VWS) UK Ltd
- Ondeo Industrial Solutions UK Ltd which includes, but is not limited to, the subsidiaries identified below:
  - Veolia Water Technologies & Solutions (UK) Limited Partnership
  - Veolia Water Technologies & Solutions United Kingdom Limited
  - Veolia Water Technologies & Solutions Service UK Limited
  - Ionics UK Limited
  - Veolia Water Purifications Systems limited
  - Monsal Limited

#### **OVERVIEW OF OUR BUSINESS**

The Veolia group is present across five continents and has 215,000 employees worldwide. Our collective purpose is to deliver ecological transformation for the benefit of everyone on the planet.



Veolia designs and provides solutions for water, waste and energy management. Through its three complementary business activities, Veolia helps to develop access to resources, preserve available resources and to replenish them.

As the water technology experts of Veolia, Veolia Water Systems (VWS) UK Ltd and Ondeo Industrial Solutions UK Ltd protect, preserve and reuse resources, tackling today's environmental challenges while creating the water treatment and process solutions of tomorrow.

Veolia Water Systems (VWS) UK Ltd and Ondeo Industrial Solutions UK Ltd have physical facilities in the UK and conducts their business activities worldwide.

The following is the process for assessing high risk activities or countries regarding slavery and human trafficking:

- Conducting a risk assessment which looks at mapping the supply chain, evaluating potential risks based on industry, geography and worker vulnerability
- Reviewing supplier practices through assessments and audits and identifying any areas where the risk of modern slavery is most prevalent for the organisation.

## **OUR POLICIES AND PROCESSES**

We are committed to the highest standards of business ethics, a culture of honesty and fair dealing and to ensuring there is no modern slavery or human trafficking in our supply chain or elsewhere in our business. Our policies reflect our commitment to acting ethically and with integrity in all our business relationships.

We have supporting policies that describe our approach to the identification of modern slavery risks and the steps to be taken to prevent slavery and human trafficking in its operations. This means, amongst other things, that we do not tolerate any form of corruption and we are committed to respecting internationally recognised human rights globally throughout our operations.

Our ***Anti Slavery and Human Trafficking Policies and Procedures*** establish our framework for acting ethically and our commitment to preventing modern slavery, forced labour and human trafficking within our operations and supply chains.

Our internal ***Ethics Guide and Anti Bribery and Corruption Policies and Procedures*** present the values that Veolia wishes to promote internally as a point of reference for ethical behaviour.

***Whistleblowing Policy*** - we encourage our employees, customers and associates to report any concerns related to direct activities or the supply chains of the organisation. This includes any areas of concern that may give rise to an enhanced risk of slavery or human trafficking. Our Veolia whistleblowing procedures allow disclosures to be raised without fear



of retribution. Concerns can be raised via **Whispli**; the Group's decentralized, unified and independent ethics alert system or to **Whispli Voice**; a dedicated hotline that enables all employees, as well as third parties, to report any concerns directly to the Veolia Group Ethic's committee. Both Whispli and Whispli Voice are designed to offer strict confidentiality and a protected status to people making a complaint. Whispli Voice has been rolled out to ensure an inclusive approach which allows all employees to voice their concerns, regardless of their location and does not require access to a smartphone or the Internet.

**Supplier Code of Conduct** - we are committed to ensuring that suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship. Suppliers are required to complete a supplier assessment questionnaire prior to doing business to meet the necessary compliance requirements, including equality, diversity and inclusion, forced labour and human trafficking.

**Recruitment Terms** - we only use specific reputable employment agencies to source employment labour. Verification and the sign up to the organisation's terms of business always takes place before the acceptance of a new agency and is subject to a contractual requirement for them to comply with the Modern Slavery Act 2015.

**Equality and Diversity** - policies identify that we work to create a workplace culture that identifies and addresses potential exploitation of vulnerable employees, through practices such as recruitment, training and reporting mechanisms, and promoting an inclusive working environment where issues can be raised.

Our **Employee Assistance Programme** provides an external and confidential support and advisory service on a range of issues where advice can be provided over the phone, online or via face to face counselling.

## **SUPPLIER DUE DILIGENCE**

We undertake due diligence when considering taking on new suppliers and regularly review our existing suppliers. This includes:

- Completing compliance checks for all new suppliers including screening for anti-slavery by our Compliance or Procurement teams
- Mapping and reviewing the supply chain broadly to assess particular geographical risks of modern slavery and human trafficking
- Conducting compliance re-assessments for existing suppliers on a regular basis
- Mitigating the risk of using suppliers with any negative findings reported through our assessments / taking steps to improve substandard supplier practices
- Suppliers are made aware of our terms and conditions and supplier charter.



## **EMPLOYEE DUE DILLIGENCE**

We ensure that all new employees are subject to pre-employment Right To Work checks using an external certified and compliant Identity Service Provider. We also ensure that employee's wages are paid electronically directly to employee bank accounts.

## **TRAINING**

We provide appropriate training to our employees on human rights, bribery and corruption, and diversity. In 2025 we rolled out mandatory Ethics and Compliance Training with an obligation of 100% completion by all assigned participants. The training was designed to:

- develop a shared awareness of ethical and compliance topics, as well as a culture of prevention and vigilance, to support Veolia's sustainable success
- strengthen employees' practical knowledge of Veolia's ethics and compliance system through practical situations
- Validate employees' knowledge and understanding of the issues at stake in a changing context

## **AWARENESS RAISING**

In 2025 we have shared targeted communications to employees on how to raise and report unethical and illegal activities as well as other forms of misconduct that go against our company values and policies.

## **ACTIONS PLANNED FOR 2026**

- Upload links to all of our policies and procedures to the intranet, so they are easily accessible for employees via this channel
- Review and update of our Anti Slavery and Human Trafficking Policies and Procedures
- Display posters across our offices and operational sites on spotting the signs of modern slavery and how to seek support for victims, both of which will provide information on how to raise concerns and seek help
- Rollout of modern slavery training campaign for employees
- Continue to conduct appropriate risk-based due diligence on all relevant third parties before entering into any new or renewed contractual arrangements. We will monitor potential anti-slavery risks and conduct annual checks on suppliers and subcontractors.
- Drive equality, diversity and inclusion throughout the business and continue to assess our strategy to ensure we create a workplace and organisational environment that is trusted and open
- Continue to monitor results through our annual employment engagement survey
- Share our open communication throughout all levels within our business
- Continue to promote the Veolia Ethics Guide for all employees including as part of new employee onboarding and induction programme



- Continue to promote our relevant training offerings throughout the business.

This statement was approved on 11th May 2026 by our board of directors who review and update it annually.

**Director's name**  
**Ian Heggie**  
**CFO VWS (UK) LTD**

**Signature:**

A handwritten signature in black ink, appearing to read "Ian Heggie".

**Date: 11th May 2026**

**Director's name**  
**Mark Smith**  
**Ondeo Industrial Solutions UK LTD**

**Signature:**

A handwritten signature in black ink, appearing to read "Mark Smith".

**Date: 11th May 2026**

**HR Leader VWS (UK) LTD & Ondeo Industrial Solutions UK LTD**

**Helen Tomlinson**

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**Signature:**

**Date: 11th May 2026**