



Modern slavery and human trafficking statement 2026

Introduction

This statement highlights the steps that Anglian Water Services Limited (“Anglian Water” or the “Company”) has taken to ensure that slavery and human trafficking is not taking place in any part of its business or within the Company's supply chain.

Anglian Water is the largest water and water recycling company in England by geographic area, serving around seven million customers across the East of England and Hartlepool. Every day, we provide around 1.2 billion litres of drinking water and recycle one billion litres of used water for our customers. We employ around 7,000 people directly, and thousands more via our supply chain.

Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop. This includes recognising the special responsibility we hold as a monopoly provider of an essential public service to deliver wider benefits to society, above and beyond the provision of fresh, clean water and effective water recycling.

We consider the long-term interests of our customers, employees, suppliers and the environment, as well as seeking to provide shareholders with a fair return. Our directors are also required to consider the benefits of the Company maintaining a reputation for high standards of business conduct. We have zero tolerance to any form of slavery or human trafficking and are committed to preventing and addressing these practices within our business and our supply chain.



Supply chain structure

Our supply chain is predominantly UK-based with some international exposure supporting our operational, infrastructure, technology and professional requirements. While the majority of our direct suppliers are based in the UK, some suppliers source goods, materials and services internationally or have international supply chains of their own.

Anglian Water operates an alliance model where strategic delivery partners work collaboratively as an integrated team to deliver outcomes. These alliance partners engage specialist suppliers and subcontractors where additional expertise, products, services or capacity are required. While subcontractors may not contract directly with Anglian Water, they form a critical part of the wider supply chain and are expected to meet the same standards for safety, sustainability, ethical conduct and performance as all organisations working within the alliance ecosystem.

The structure of our supply chain broadly consists of:

- **Tier 1 Suppliers** – Suppliers who sit within our Alliances with whom we have direct contractual relationships.
- **Tier 2 Suppliers** – Suppliers who sit outside our Alliances but with whom we also hold direct contractual relationships.
- **Further Upstream Suppliers** – Organisations involved in the manufacture or provision of raw materials, components and specialist products.

Goods are distributed through a number of different routes. This includes direct delivery from suppliers to our operational sites and offices, or through our in-house logistics operation.

Services are similarly delivered through a mixture of directly contracted suppliers, specialist contractors and subcontractor networks, with some professional and technology services being delivered remotely.

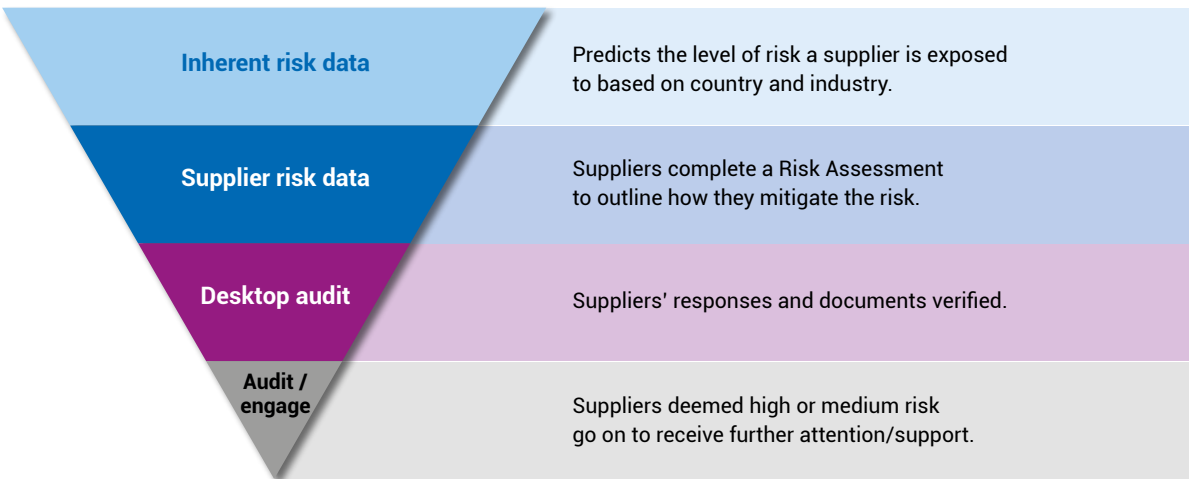
The complexity of our supply chain varies considerably by category. Some areas are relatively straightforward and predominantly UK based, while others involve multiple tiers of suppliers. Visibility is strongest for Tier 1 and 2 suppliers but can reduce further upstream.

Our procurement processes

Framework terms and conditions

We require framework suppliers (Tier 1 and Tier 2 suppliers – as described above) to demonstrate that they provide safe working conditions, treat workers with respect, act ethically, and comply with all applicable legal requirements.

Anglian Water modern slavery risk insights



As part of our standard procurement process, we complete Environmental, Social and Governance (ESG) materiality mapping to identify supplier categories, industries, products or services that may present a higher risk of modern slavery, considering factors such as sector and sourcing geography. This analysis helps determine where additional focus and additional due diligence may be required during relevant tender activity. Enhanced due diligence efforts help us to understand the potential risk of poor labour practices throughout the supply chain beyond those suppliers with whom we have a direct spend.

Our analysis is informed by external benchmarks, including the Global Slavery Index, as well as new co-developed utilities industry guidance on sectors considered to be at higher risk of modern slavery.

By way of example, suppliers operating in the construction or construction materials industries, smart technologies (batteries and energy infrastructure including metering and EV), incident responses, or suppliers of solar panel components are considered likely to be high-risk.

We acknowledge that some supply chains, particularly those involving globally sourced materials and components such as solar technologies, are highly complex and opaque. In these areas, full traceability is not always achievable, and businesses may have limited visibility or influence over conditions further upstream. Therefore, we continue to take a risk-based approach to understanding, assessing and mitigating potential modern slavery risks through supplier engagement, due diligence, collaboration and continuous improvement.

All framework suppliers are required to complete a Modern Slavery Risk Assessment during the early stages of the procurement process. Suppliers answer questions not only regarding their compliance with Modern Slavery legislation, but about with the proactive actions they are taking to identify, assess and mitigate modern slavery risks within their own operations and supply chains. Where required, we undertake further due diligence and targeted supplier engagement, particularly with suppliers operating in higher-risk sectors, to gain greater visibility of complex supply chains and support continuous improvement. In some cases, a remedial action plan may be implemented that requires the supplier to take further action to mitigate the risk of modern slavery within their organisation and supply chain.

In addition, Anglian Water utilises the Achilles Utilities Vendor Database Service (UVBD) platform through Achilles Information Limited, a utilities industry pre-qualification system, which captures and validates supplier data for existing and potential suppliers. Registered suppliers can also complete modern slavery assessments via this platform.

Anglian Water's standard Framework Terms and Conditions contain contractual provisions that allow us to terminate a contract with any supplier who fails to comply with our requirements regarding modern slavery legislation.

High-risk suppliers: Each framework supplier is required to confirm that they are compliant with the Modern Slavery Act 2015 along with their respective supply chains. Additionally, they are required to assess the risk of modern slavery within their organisation and put in place appropriate mitigation where risk exists. The likelihood that our suppliers may be at high risk of non-compliance with the Modern Slavery Act 2015 is assessed based on their responses in relation to indicators such as the nature of the industry, country of origin for goods and services and other relevant supplier information, such as pre-employment check procedures.

Where appropriate, we will engage directly with higher-risk suppliers, for example through visits to their sites or premises. These visits provide an opportunity to discuss their policies, procedures and practical on-the-ground activities to identify and address potential harm to workers, whether within their own operations or wider supply chains. They also support two-way learning, enabling us to share knowledge and best practice while learning from suppliers' own approaches to continuous improvement, such as safe whistleblowing channels or risk identification methods tailored to their organisation and inherent risk profile.

Alliance partners: Our Alliance partners deliver our capital programmes. Our highest spend is with these suppliers. We work closely with our Alliance partners in an open, transparent and collaborative environment. All Alliance partners have been selected based on alignment with our purpose, values and behaviours, and we work collaboratively with our supply chain to promote our long-term vision.

Non framework suppliers: for spend over £35,000, suppliers who are not on a tendered framework, but do hold contracts with Anglian Water, are also required to complete a Modern Slavery Risk Assessment.

Supplier assurance and risk monitoring

Our Commercial Operations function has continued to lead a robust programme of regular desktop audits to assess compliance with the Modern Slavery Act 2015. Suppliers identified as higher risk are subject to ongoing monitoring to ensure sustained adherence to ethical standards. During the financial year ended 31 March 2026, the Insights, Policy and Governance team within Commercial Operations, completed 200 supplier desktop audits. The outcomes of these audits are reported monthly in both our financial controls report and monthly management information reporting. This forms part of our ongoing assurance checks to ensure the approved procurement procedure is being followed.

Procurement assurance enhancements

To strengthen our oversight of supplier related risk, the business has introduced a new procurement assurance process that explicitly incorporates modern slavery compliance. Quarterly assurance checks are now in place to verify that suppliers are being appropriately assessed by the procurement teams against these requirements.

Our processes were updated to include routine monthly first-line assurance activity, designed to ensure that all in-scope suppliers have completed modern slavery risk assessment questionnaires, as well as quarterly second-line assurance checks to assess whether the outputs of the first-line assurance process are in line with the written requirements and to allow for continuous review and process improvements.

Alliance partner engagement

We have completed our annual assessments of the 16 Alliance delivery partners, reviewing their procedures and policies related to modern slavery. All partners demonstrated a high level of compliance, underpinned by clear and structured methodologies. As part of our commitment to deeper engagement, we introduced in-person interviews this year to complement the desktop audits. These assessments are now fully concluded, with feedback shared across all relevant stakeholders to support continuous improvement and strengthen our combined efforts to address the risk of modern slavery in our supply chain.

Every year, the Commercial Procurement team and procurement colleagues from our Alliance partners complete role-specific training, deliberately timed to align with Anti-slavery week in mid-October. This training is delivered using some bespoke elements co-developed with Utilities Against Slavery (UAS) as well as tailored content specific to Anglian Water's procurement practices with a relevant industry focus e.g. modern slavery in the construction sector. The training reinforces key procedures and behaviours, including a reminder of our whistleblowing policy and appropriate channels for reporting any concerns relating to forced labour.

Supplier code of conduct

The Anglian Water Supply Chain Code of Conduct outlines expectations of our suppliers to actively minimise the risks of modern slavery and human trafficking within their organisations and supply chain. The code encourages our suppliers to report any incidences of unacceptable behaviour and to utilise the Company's whistleblowing procedure where needed (see below).

Anglian Water has adopted the Chartered Institute of Procurement & Supply (CIPS) Corporate Code of Ethics (the Code), and we require our suppliers to meet the requirements under the Code within the terms of their contract. Adoption of this Code requires suppliers to 'commit to eradicating unethical business practices including bribery, fraud, corruption and human rights abuses, such as modern slavery and child labour'.

Adherence to the Supply Chain Code of Conduct is embedded both within our Terms and Conditions but going forwards agreement will also be required as part of our Supplier Registration process as part of our new e-procurement system.

Key performance indicators in respect of the 2025/26 financial year:

- Number of suspected incidents of modern slavery reported:
Nil (Nil: 2024/25 financial year)
- Number of modern slavery supplier desktop audits completed:
200 (163: 2024/25 financial year)





Our people

Policies and communicating with our employees

We have a comprehensive suite of employment policies that help to prevent modern slavery. These policies cover:

- [whistleblowing](#)
- [human rights](#)
- [grievances](#)
- [disciplinary matters](#)
- [recruitment](#)
- [dignity at work](#)
- [domestic abuse](#)
- [safeguarding](#)

We have established governance processes to consult on and implement employment policies. The Policy Review Group, which comprises both union and non-union members, reviews and shapes Company policies. All employment policies are published on Lighthouse, our intranet, which is accessible to all employees, agency workers and Alliance partners.

All our people must comply with Anglian Water's policies at all times. As part of the Company's commitment to fostering a respectful and inclusive workplace, all employees are required to complete Inclusion (Dignity at Work) training. In May 2020, the Anglian Water launched its Inclusion Community, which works together to identify ways in which the Company can be a more inclusive employer. The Inclusion Community now has more than 400 members and works to educate and engage people on all aspects of inclusion as well as sharing ideas from outside of Anglian Water.

As an organisation, Anglian Water has a clearly articulated set of values and behaviours which underpin our Purpose. Together we: build trust, do the right thing and are always exploring. We regularly engage with our employees via our three recognised trade unions and employees are invited to CEO Town Hall briefings on a regular basis. Employees can also email the Chief Executive Officer, Mark Thurston, directly on any matter via a dedicated email address.

Under Anglian Water's Whistleblowing Policy and Procedure, individuals (including those who work for our partners and suppliers) can raise concerns via an externally facilitated helpline or confidential email address, which are managed via an independent provider. All whistleblowing allegations and the results of the subsequent investigations are reported to the Audit and Risk Committee.

The Company's code of conduct: 'Doing the Right Thing', explains what we expect from our people and how we work together to maintain the highest standards of integrity, respect and accountability. It applies to all of the Company's employees and those of our Alliance Partner organisations. The purpose of 'Doing the Right Thing', which is reviewed regularly, is to illustrate how our policies work in practice. Areas covered include health and safety, modern slavery, dignity at work, fraud and anti-bribery. 'Doing the Right Thing' details the work undertaken to ensure that there is no modern slavery within the organisation or within its supply chain and explains how employees/partner employees should raise concerns should they have any.

Recruitment

Anglian Water carries out pre-employment checks on all directly employed staff and issues a written contract of employment. All of the Company's employees are based in the UK. Information is provided to all new employees on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

The majority of Alliance partners' employees are captured on Workday, (Anglian Water's HR administrative system), which provides us with greater visibility of our indirect workforce.

Anglian Water engages recruitment agencies to support both temporary and permanent hiring needs. We conduct thorough legal and procurement due diligence on all temporary staffing providers to ensure full compliance with relevant legislation and ethical standards. Similarly, before partnering with any permanent recruitment agency, we verify that they meet all legal and regulatory requirements. This consistent approach reflects our commitment to responsible recruitment practices across our supply chain.

Paying a fair wage

All temporary and permanent employees are paid at levels which are, at minimum, in line with those recommended by the Living Wage Foundation. Our apprentices are an exception, with other arrangements in place to ensure they are paid in line with government apprentice rates, as a minimum. Apprentice rates of pay increase every year as their skills and experience develop.

Sector collaboration

Anglian Water continues to be an active member of the Utilities Against Slavery (UAS) industry group. The UAS includes representatives from several different utility companies and NGO Slave-Free Alliance, and its aims include sharing best practice, lessons learnt and standardisation of processes and guidance, to form a unified approach to tackling modern slavery across the industry.

Work undertaken by UAS over the 2025/26 financial year included:

- Issuing of industry guidance on high-risk sectors;
- Development and rollout of shared training resources and toolkits for the annual Anti-Slavery Week 2025;
- Supplier Collaboration Event on 16th October 2025, where suppliers were invited to hear case studies, insights and expert advice around tackling modern slavery; and
- UAS Strategy Day – members came together to share knowledge, exchange best practice and collaborate on key topics, including UK government Transparency in Supply Chains and CCLA benchmarking, high-risk sector classification, and the development of common industry standards for construction labour providers and subcontractors.

In March 2026, we also participated in 'ethica26' in London, a cross-sector leadership summit focused on human rights in supply chains. The event provided valuable insights into regulatory developments, responsible sourcing approaches and innovative practices for strengthening supply chain transparency and resilience.





Proposed next steps during 2026/27

Pilot: This year, we will be running a pilot project with Severn Trent for joint engagement and supplier audits with some of our mutual suppliers. The aim of this pilot is to work with our suppliers to develop and trial how we can standardise supplier on-site audits and share data to reduce duplication of effort and improve the quality of our engagement with suppliers.

Anti-Slavery Week event: During Anti-Slavery Week in October 2026, we will be holding an Anglian Water Anti-Slavery event themed "From Awareness to Action". The event will bring together colleagues from across key business areas, including Procurement, Supply Chain, People, Legal, Health and Safety, Risk and Compliance, Sustainability and Communications to raise awareness of modern slavery and strengthen our collective response. We will be hearing valuable insights from a lived experience consultant, as well as conducting panel discussions and facilitated roundtables. The event will focus on what we can deliberately do differently as a business to find, fix and prevent worker exploitation, and secure practical commitments and agreed next steps from the day.

Safer Every Day: We are working with our Health and Safety team to integrate modern slavery awareness and the prevention of worker harm into our 'Safer Every Day' programme and site engagement activities. This will help bring modern slavery risk into existing health, safety and wellbeing conversations, supporting greater awareness of exploitation risks, stronger worker voice and improved visibility of potential harm on operational sites.

Non-compliance

Any identified or suspected occurrence of non-compliance with the Modern Slavery Act 2015, either within our business or our supply chain, will be assessed on a case by-case basis and appropriate action will be taken, including, where appropriate, terminating the contract of the relevant supplier.

This statement

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Anglian Water's anti-slavery and human trafficking statement for the financial year ending 31 March 2026. This statement was approved by the Board of Anglian Water on 30 September 2026.



Mark Thurston

Mark Thurston
Chief Executive Officer
Anglian Water



Anglian Water Services Limited

Lancaster House
Lancaster Way
Ermine Business Park
Huntingdon
Cambridgeshire
PE29 6XU

anglianwater.co.uk