

# Modern Slavery Statement

For 12-months ending  
31 March 2026



This statement sets out the steps that continue to be taken by the SP Electricity North West Group of Companies to mitigate the risk of modern slavery occurring within its operations and supply chain and, in doing so, to conform to the requirements of the Modern Slavery Act 2015. This approach aligns to the pillars that underpin the UN Guiding Principles of Business and Human Rights. It covers the 12-month period from 1 April 2025 to 31 March 2026. Please refer to Appendix 1 for the entities within the SP Electricity North West Group of Companies, which in turn is part of the Iberdrola Group.

The statement is prepared by the Procurement team, which collates information from several information sources available to the business, such as our Achilles system, liaising with external parties as required. The statement is subject to a well-established governance process, with the Head of Commercial Services signing off the statement prior to formal approval by the North West Electricity Networks (UK) Limited board.

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# Modern slavery is a broad term covering instances where victims may be subject to conditions of slavery, servitude and forced or compulsory labour. SP Electricity North West is committed to identifying and addressing modern slavery, going beyond legal compliance.

We continue to review our policies and processes in this area, with a view to improving our understanding of the risks within our operations and supply chain and the mitigation we need to put in place to address the risks posed by modern slavery. In the year we have continued to strengthen our approach to commercial assurance, further mitigating the risk of modern slavery occurring in our supply chain through increased supplier engagement and risk assessment activity.

SP Electricity North West is a long-standing member of Slave-Free Alliance (SFA), an international social enterprise, wholly owned by the global anti-slavery charity, Hope for Justice. SFA’s mission is to help organisations of all sizes build their resilience against the risk of modern slavery in their operations and supply chain. SP Electricity North West is a founding member of the Utilities Against Slavery (UAS) working group which is coordinated by SFA. The working group meets monthly to develop collaboratively an industry focused approach on the issue of modern slavery and drive meaningful change within the sector. The group has agreed on the following objectives:

**Develop a common understanding of the critical issues common to all members.**



**Share best practices amongst the group's members.**



**Identify and work collaboratively on jointly agreed strategic workstreams.**



**Develop training materials to share with our supply chain and other stakeholders.**



**Engage with other sectors to share good practices and identify common challenges.**



Work that has been undertaken in the period 1 April 2025 to 31 March 2026 to meet the above objectives and future steps can be found in the attached link to the [UAS Chair's Annual Report](#). The Procurement team leads on initiatives with the SFA and UAS on behalf of SP Electricity North West.

SP Electricity North West's key interaction with the UAS in the year has been working with the UAS Chair to conduct supplier assessments and produce guidance for fellow UAS members to conduct similar reviews. We have also helped to develop a training pathway for Procurement professionals to aid the effectiveness of the work they do to mitigate the risk of modern slavery. This training is in response to an initial engagement exercise undertaken with representatives from Procurement teams of UAS members.

**As set out in our previous statement, we have also engaged with SFA to:**

- Conduct a refresh of a high-level modern slavery risk assessment of our key suppliers by spend (expanded to cover top 100 suppliers).
- Review our Modern Slavery statement to assess compliance with the requirements of the Modern Slavery Act 2015, and alignment to the Transparency in Supply Chains Guidance issued in December 2025 by the UK Home Office.
- Support our efforts to promote awareness of Anti-Slavery week and 'Spot the Signs' training for our workforce.

We continue to monitor and develop our procurement processes. Our focus has been to enhance our supplier due diligence processes to aid compliance with our commitment to prevent slavery or human trafficking being present in any part of our business. Our Procurement team continues to lead on mitigation to reduce the risk of modern slavery appearing within our supply chain.

As a customer-facing organisation, we recognise the importance of the part we play in helping to protect our communities and beyond from these abhorrent practices. To that end, our efforts to tackle modern slavery continue to form a key element of the company's Purpose-led Responsibility Framework which supports colleague-led community engagement, setting out how we work to deliver for our customers, particularly those who are vulnerable, and other stakeholders. Our aspirations in addressing modern slavery go beyond legal compliance considerations. In line with our corporate purpose and principles, it is simply the right thing to do.

As part of our ongoing commitment to work with the SFA and UAS and improve our approach to addressing the risks of modern slavery, SFA has previously conducted a gap analysis exercise to identify areas for improvement in the measures we have implemented. Key areas that we have continued to monitor in 2025/26 following on from the gap analysis assessment can be summarised as:

- We have a training needs assessment for our people that was previously developed with the support of SFA. We have refined our training/communication for existing and new employees.
- We continue to keep our key company policies/documents (e.g. whistleblowing policy) under review to ensure that they provide better reference and visibility to modern slavery, in line with good practice. Employees are encouraged to report modern slavery concerns under this policy.
- We continue to promote awareness of modern slavery alongside other areas of customer vulnerability on our external website.
- SFA has conducted a review to assess how SP Electricity North West's statement aligns with the updated Transparency in Supply Chain guidance which was issued by the Home Office in 2025. This work helps SP Electricity North West to plan how it will amend its modern slavery statement to incorporate newly mandated structure/content.

A robust governance process is in place to ensure an appropriate level of oversight for the production of this modern slavery statement. The statement is drafted by the Commercial Assurance team within Procurement, pulling together information from across the business, and is subject to executive line management sign off prior to approval at the North West Electricity Networks (UK) Limited board.



# 1. Our organisational structure and supply chain

SP Electricity North West serves 5 million customers at 2.4 million domestic and industrial locations. It has approximately 2,600 employees, supports hundreds of contractors, and provides a safe and reliable electricity supply, 24 hours a day, seven days a week.

A high-level breakdown of our employees by function is as follows:




| Area                               | Headcount    |
|------------------------------------|--------------|
| Operations                         | 1,046        |
| Support Functions                  | 547          |
| Asset & Investment                 | 405          |
| Connections                        | 253          |
| Construction & Maintenance Limited | 192          |
| Customer                           | 147          |
| <b>TOTAL</b>                       | <b>2,590</b> |

We own, invest in, operate and maintain the network of poles, wires, transformers and cables which carry electricity to and from homes and businesses across the North West. The company operates exclusively in the United Kingdom.

Our employees focus on delivering our core service of managing and maintaining the network, with contractors being used where it is a service that is widely available in the marketplace (e.g. excavation & backfill), providing a more efficient cost option for our customers.

Our primary strategy in respect of resourcing is to upskill our internal workforce, ensuring security, productivity and flexibility. For those services where we rely on contractors, such as cable laying, excavation and backfill, we operate competitive framework agreements with opportunities for extensions. This provides a pricing and resource structure which allow us to continue developing visibility of upcoming work for our contractors to ensure a suitable overall resource level is in place and price stability is achieved.

Our procurement activity is split between the following categories:

-  **Construction**
-  **Plant & Materials and Innovation & Engineering**
-  **Indirects (IT&T and Corporate Services)**

To support our work activities, we have a broad range of suppliers on our vendor database. Whilst most of these suppliers are UK-based, we have suppliers from countries deemed as 'higher' risk and previous gap analysis conducted by SFA identified extended tiers of subcontracting in construction and Personal Protective Equipment (clothing) as risk areas. Key equipment types are sourced from organisations who operate within the UK, but several have manufacturing operations in different countries. This is summarised in the table below.

| Equipment type  | Country of manufacture      |
|---|-----------------------------|
| Switchgear / Sectionalisers                               | Turkey / Brazil             |
| 132kV Grid Transformers                                   | Austria / Portugal          |
| 33kV, 11kV and Service Cable                              | Wales / Poland / Italy      |
| Ground / Pole Mounted Transformers / On-Load Tap Changers | Republic of Ireland / India |
| Overhead line conductor                                   | UK / Portugal               |
| LV Kits   | UK                          |
| LineSIGHT / PreSENSE / ReLINK / BAU                       | Northern Ireland            |
| Air Break Switch Disconnectors                            | UK / Dubai                  |
| PPE Clothing  | Slovakia                    |

Of the 113 suppliers currently tagged in Achilles, representing over 80% of annual spend for SP Electricity North West, 93% of suppliers are designated as having the United Kingdom as their country of incorporation. All the tagged suppliers have confirmed to Achilles that they have not been convicted for a breach of any labour laws, or been convicted for the use of forced/bonded/prison/child or slave labour, or harsh disciplinary measures, in the countries in which they operate, within the last five years.

Our current and developing due diligence measures are outlined below in section 3.

Overall accountability for our strategy to address the risk of modern slavery occurring within our supply chain sits with the Head of Commercial Services. Progress against this strategy is monitored as part of the quarterly Purpose-led Responsibility Framework steering group meetings, which has Executive sponsorship. This reinforces our aspirations to go beyond legal compliance in our approach to addressing modern slavery.

The Procurement team has worked closely with the colleagues looking after other aspects of the Purpose-led Responsibility Framework, most notably Diversity and Inclusion, to facilitate round table discussions with a group of suppliers and share good practice. Diversity and inclusion have direct relevance to modern slavery. For example, marginalised groups or individuals can be vulnerable to exploitation or find it more difficult to report discrimination or other abuses.

SP Electricity North West however acknowledges the current limits of our supply chain visibility within our categories. Whilst there is visibility of lower tier suppliers within the UK for our key construction activities, overall visibility of the supply chain below Tier 1 is limited.



## 2. Policies in place in relation to slavery and human trafficking

We are subject to a high level of regulation (e.g. Ofgem) given our public facing role and have a comprehensive set of policies and procedures that emphasise our commitment to the identification and prevention of unethical activities within our organisation, including the prevention of modern slavery. Key policies in relation to this area remain as follows:



### Modern Slavery Policy

We are committed to acting ethically and with integrity in all our business dealings and relationships. This includes our commitment to identifying and addressing risks of modern slavery in all parts of our business.

If we were to become aware that any of our suppliers had an issue relating to modern slavery, we would look to work proactively and collaboratively with that supplier to address the issue. We would review our rights to terminate the relevant contract(s) only as a last resort if, for example, the supplier did not seem to be taking the issue seriously. Our primary aim would be to try and address the issue head on, not simply walk away.



### The Speak Up (“Whistleblowing”) Policy

SP Electricity North West seeks to ensure that any employee may voice concerns about incidents of wrongdoing, or other suspected malpractice, without fear of criticism or future discrimination. At SP Electricity North West we are proud of our strong commitment to high ethical standards in the way that we work. We support our employees to speak up when they see or believe there is wrongdoing in our workplace and our Whistleblowing Policy is in place to outline the procedure employees can use to raise their concerns. Although the aim of this policy is to provide an internal mechanism for reporting, we have in place a confidential, independent, external reporting line (including email) where employees can raise their concerns, should this be their preferred choice of communication. The policy contains clear reference to modern slavery. It should be noted that no instances relating to modern slavery concerns have been reported in the period via any of the reporting mechanisms available.



### Ethics in our Business Policy

We understand the importance of operating with honesty and integrity in our business. We have captured this in a single ethics statement which applies to everyone who works for or on behalf of the business. We provide a supportive environment for colleagues to voice any concerns. Specific highlights of the policy include:

- Complying with relevant laws and regulations.
- Following procedures and policies.
- Zero tolerance for bribery and corruption.
- Acceptance of gifts and hospitality by exception only.

This policy is subject to Board review to ensure that it remains fit for purpose. The policy contains specific reference to our commitment that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Training is provided to everyone in the organisation with refresher sessions being run periodically. A training matrix has been created to ensure that modern slavery is appropriately covered for new and existing employees.



## Employment Screening Policy

It is important that we also minimise the risk of modern slavery among the colleagues we employ directly. Although perceived as low risk, we carry our pre-employment checks across the business during recruitment, before or as employment starts.

Once in employment, we also conduct checks to detect duplicate bank details and next of kin information/phone numbers to mitigate against the risk of a gang-master's information being provided. The screening process has been enhanced in the year as part of our efforts to ensure that we meet requirements of the Cyber Assessment Framework (CAF). The CAF provides a systematic and comprehensive approach to assessing the extent to which cyber risks (including physical security) are being managed by organisations responsible for vitally important services and activities. The higher level of scrutiny has also been applied to our supply chain, to meet our licence obligations relating to ensuring people working on our behalf are fit and proper and that SP Electricity North West treats its customers fairly. We ask key contractors who have operatives who come into face-to-face contact with our customers to confirm that all operatives are DBS checked. We carry out this exercise every 6 months.



## Real Living Wage Employer

SP Electricity North West values all our employees and we believe fair pay for a day's work creates a positive working environment for all our people.

We continue to be a Real Living Wage Employer, and in addition to creating a more robust process to identify relevant suppliers, we commit to encourage these suppliers to pay the real living wage and to seek accreditation for their own organisations.



# 3. Due diligence measures in place

**Our due diligence procedures to assess our supply chain are proportionate to the risks of modern slavery and align with SP Electricity North West’s values and commitment to behave in an ethical manner. Our procedures can be summarised as follows:**

✔ We continue to use Achilles Analytics as a key part of our due diligence measures. Achilles Analytics is an all-in-one data intelligence tool designed to simplify the management and reporting of validated supplier data collected within the Achilles Utilities Vendor Data Base (UVDB). Use of Analytics allows us to track performance of key suppliers in their approach to addressing social issues such as modern slavery. For suppliers to the utilities industry, an audit service (Achilles Verify) is available that enables a supplier to demonstrate their capabilities to clients within the utilities sector. This service covers the procedures the supplier has in place to prevent slavery and human trafficking in its own organisation and supply chain. For the procurement of those contracts that are considered high risk, we are committed to reviewing the Achilles Verify audit reports where possible. If reports are not available, we engage in discussion directly. In the year Achilles has developed a specific Modern Slavery report which provides confirmation for the following questions:

- Has your company been convicted for a breach of any labour laws, or convicted for the use of forced/bonded/prison/child or slave labour, or harsh disciplinary measures, in the countries in which it operates, within the last five years?
- Has your company been convicted of a breach of any child labour laws in the countries in which it operates within the last five years?
- Has the economic operator, to its knowledge, breached its obligations in the field of labour law?
- Has your company been convicted for a breach of any labour laws in the countries you operate within the last five years?
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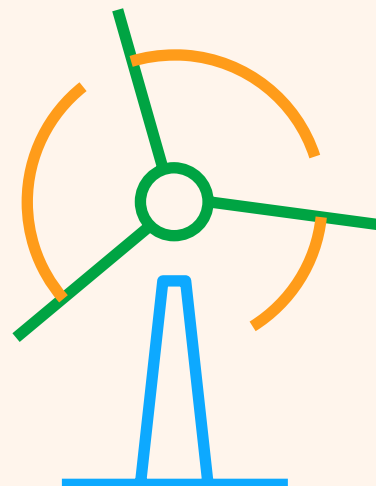
- Does your company have a Modern Slavery and Human Trafficking statement?
- Does your company publish its modern slavery statement to the UK Government Modern Slavery Statement Registry?

✔ We have engaged in the period with SFA to refresh our supplier risk assessment, commencing this in February 2026. This follows on from an initial exercise conducted in July 2024 and provides further information on potential risks within our supply chain which informs the prioritisation of work to be undertaken. This is in line with our plan to undertake periodic risk assessments using SFA’s expertise in this area.

✔ Given we are now part of the Iberdrola Group, we have access to GoSupply, a vendor registration platform, which is used across the Iberdrola Group and acts as a single, consistent point of registration for all third parties wishing to become a supplier of ScottishPower. All third parties registering in GoSupply are required to confirm acceptance of our Supplier Code of Ethics, as well as provide evidence of their own Sustainability credentials, including Human Rights and ethical behaviour. Those third parties registering at the highest level are required to complete a questionnaire to determine an Iberdrola score against three pillars – Environmental, Social & Governance. This score is then monitored to encourage all third parties to reach an acceptable threshold to be considered for contract awards within the Group.

✔ Our Supply Chain Charter outlines the key principles of our policies on Modern Slavery, Business Ethics and Anti-Bribery and Corruption to those organisations that we contract with to make our stance on these matters clear. The Supply Chain Charter is now issued as part of all procurement engagement with suppliers who are required to confirm their acceptance of and compliance with the Charter. The Charter has been subject to review in the year.

- ✔ We have in place a specific section for existing and potential suppliers on our external website which provides information regarding our procurement procedures. In addition, our Supply Chain Charter features prominently so that expectations of our suppliers are clearly communicated, including Modern Slavery.
- ✔ As a key part of the contracting process, third parties are required to agree to terms requiring them to operate ethically and in compliance with relevant legislation, including in respect of Modern Slavery, as well as their ethical obligations in relation to the recruitment, management and compensation of employees. Suppliers are also required to ensure that any sub-contractors are also obliged to meet these obligations.
- ✔ We continue to review our suppliers in terms of the level of business we do with them, whether they are based in 'high' risk areas of the world where slavery might be more prevalent and the product types they supply us with. See Section 4, 'Risk Assessment' below.
- ✔ We have built in enhanced coverage of the Modern Slavery Act to our tendering processes and require evidence of compliance from suppliers before awarding contracts.
- ✔ We continue to make clear our position on modern slavery and expectations from our suppliers by writing to our entire supplier base in April each year, reiterating our ethical expectations of our suppliers, specifically identifying Modern Slavery. We also issue our supplier base with key learnings from Modern Slavery assessments we have conducted on suppliers (anonymised).
- ✔ We have worked with SFA to conduct a refresh of a risk assessment exercise on our key suppliers (top 100 suppliers). We have performed a desk top exercise to gather information available for those suppliers assessed as high risk and hold periodic briefing sessions with key suppliers to raise the visibility and awareness of modern slavery risks. This is through either meetings with individual suppliers or roundtable discussions.
- ✔ We ask our key suppliers to demonstrate to us the measures they have in place to prevent modern slavery arising in their own supply chains and we will continue to monitor this through periodic meetings and visits to our suppliers' premises. As part of this, we look to conduct periodic assessments of key suppliers to check that the measures they have in place to mitigate the risk of modern slavery are working effectively. We will identify suppliers via periodic risk assessments conducted by SFA or through other work with UAS. The UAS Chair has facilitated assessments in the year, with key learnings being shared with our entire supplier database.
- ✔ Our standard contractual terms require suppliers to comply strictly with the Modern Slavery Act and the UN Convention on the Rights of the Child.



# 4. Risk assessment and management

**Our supply chain is risk assessed using the following criteria to assess and manage risk to workers:**

- ✔ **Country risks:** Exposure may be greater in global supply chains in countries where protection against breaches of human rights is more limited than in the UK. We have a broad range of suppliers, many of whom procure their materials or components from such countries. We continually work with suppliers to gain a more detailed understanding of the impact on our supply chain, utilising reports such as the Global Slavery Index. However, whilst visibility of individual indirect suppliers is limited, we use Achilles Analytics to monitor country risk profiles (see section 1 for our higher risk countries).
- ✔ **Product risks:** There are various risks in different product sectors. Certain industries, such as clothing manufacturing, are classified as ‘high’ risk and we risk assess across product categories.
- ✔ **Business partnership risk:** Our key contractual partners tend to be longer term and therefore involve less risk as we build up an in-depth knowledge of our partner’s operation and policies. Whilst the vast majority of our key contractual partners tend to be UK based, we are not complacent and continue to work with them to understand how modern slavery risks are being managed, especially regarding subcontracted labour.

We have worked with SFA to review our risks across our supply chain and continue to review the mitigation that is in place to address these risks. For example, in the year we have worked with one of our suppliers who source skilled resource from countries within the Commonwealth in order to gain assurance that appropriate working practices are in place.

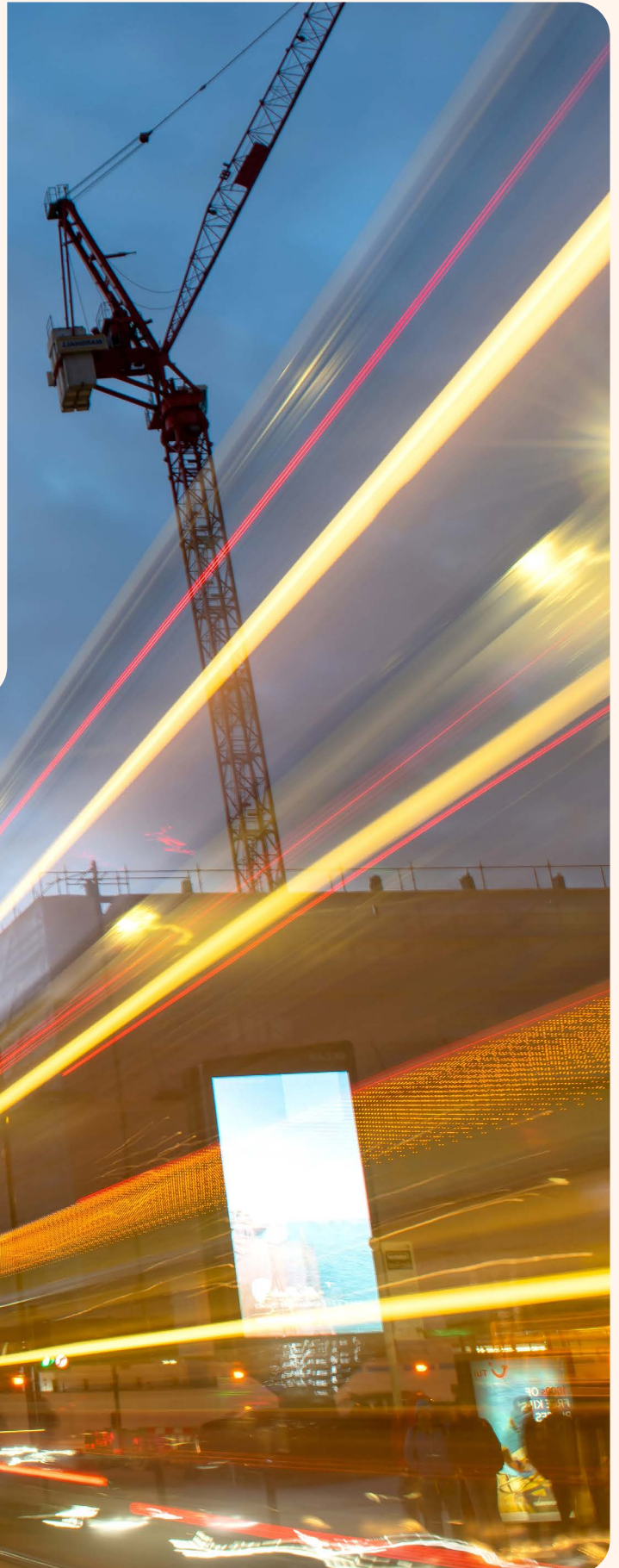
The identification of modern slavery risk is managed through the corporate risk management process. Accountability for conducting, overseeing and approving modern slavery risk assessments within the Supply Chain rests with the Head of Commercial Services. The training of colleagues to aid identification of modern slavery risks and signs is led by the Procurement team with its reporting line to the CFO during this period. Should any instance of potential modern slavery be reported via the reporting mechanisms in place, we would seek advice from SFA in the first instance.



# 5. Key performance indicators

**We have several KPI measures in place for supplier engagement and our internal training programme to help evaluate the effectiveness of the steps that we have put in place and demonstrate that we are making progress in our efforts to prevent modern slavery from existing in our supply chain.**

Current KPIs focus on engagement, training events and leadership. For example, one KPI is ensuring that 100% of the Procurement team have received modern slavery training in the year. The KPIs were formulated following previous work co-ordinated by SFA through the UAS group. We continue to keep our KPIs under review and will follow good practice as identified through work performed with the UAS group.

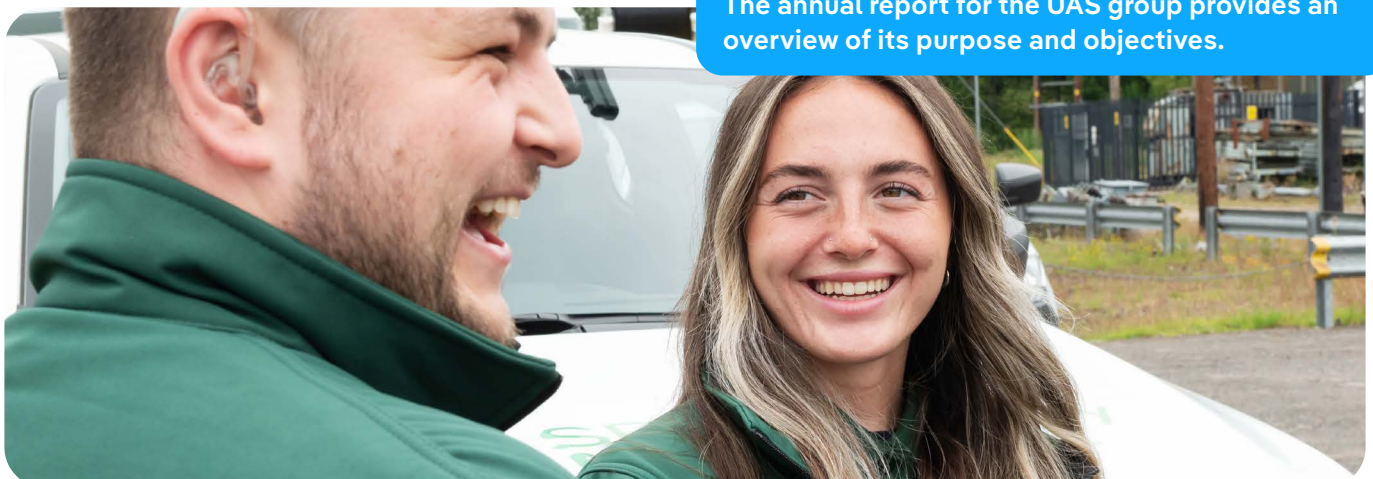


# 6. Training on modern slavery and trafficking

The company undertakes several measures to help raise awareness of modern slavery amongst our colleagues and suppliers and embed policy requirements which can be summarised as:

- ✔ Our corporate induction process which captures all new starters features a segment on Modern Slavery and is focused on helping our people to spot the signs of Modern Slavery and understand reporting options that are open to them.
- ✔ Our Modern Slavery policy and our Business Ethics policy are promoted to new and existing employees.
- ✔ The Procurement team has been trained in the year, and company-wide communication initiatives have been undertaken. This training focuses on spotting the signs of modern slavery when they are performing work within our communities. Such signs might be an unusually high number of people living in the same accommodation and particular behaviours that individuals might exhibit which might seem out of the ordinary to our operatives.
- ✔ Our employees are educated via periodic articles in our company bulletins (e.g. promoting Anti-Slavery Day, newsletter updates and e-Learning training).
- ✔ We have held periodic roundtable and briefing sessions with suppliers to raise the visibility and awareness of modern slavery risks, and the need for mitigation to be put in place.
- ✔ We are promoting awareness of modern slavery alongside other areas of customer vulnerability within a designated section of our external website.
- ✔ We will review our training materials with support from the SFA by 31 December 2026.
- ✔ The Procurement team continues to lead efforts within SP Electricity North West to support UAS in addressing modern slavery risks and issues in the sector. The group consisting of organisations from the electricity, water and gas industries meets bi-monthly to share best practice, create co-ordinated risk management approaches and raise awareness of modern slavery, ultimately helping to prevent the exploitation of workers and others. Key training we are developing with UAS relates to Procurement training pathways and enhanced guidance for conducting supplier assessments.
- ✔ So as to promote knowledge and awareness of modern slavery risks and mitigation, the SP Electricity North West Procurement team is represented at events such as the SFA Annual Conference, and other external events such as Ethica 26. The Ethica 26 summit is organised by SFA and Hope for Justice, bringing together senior leaders, policy makers and NGOs to address human rights in supply chains.

The annual report for the UAS group provides an overview of its purpose and objectives.



# 7. Continuous improvement

**We strive to make incremental improvements to our approach to addressing the risks of modern slavery year on year.**

We understand that we have a responsibility to our stakeholders, most importantly the customers we serve, to continue to assess and mitigate the risk of modern slavery. We will continue to remain vigilant and review our approach to ensure that we have appropriate mitigation in place for this risk. Should we identify any incidents related to modern slavery, we will look to collaborate with appropriate parties to address the root causes.

Our key objectives for the forthcoming year will be to continue to work with the SFA to review training materials for our employees and refresh our risk assessment for key suppliers within our supply chain. This refreshed assessment will build on previous work conducted with SFA and aims to provide a more structured, risk-based and outcome-oriented understanding of modern slavery risks across SP Electricity North West's supply base.



A handwritten signature in dark green ink that reads "S Trubshaw".

**Stephanie Trubshaw**  
COO and Statutory Board Director for North West  
Electricity Networks (UK) Limited

This statement has been approved by the North West Electricity Networks (UK) Limited Board on behalf of the Electricity North West Group of Companies listed in Appendix 1.

30 June 2026

# Appendix 1

## Electricity North West Group of Companies

| Company Number | Registered Name   |
|----------------|---|
| 06428372       | North West Electricity Networks (UK) Limited                  |
| 06428374       | North West Electricity Networks (Finance) Limited             |
| 06428534       | North West Electricity Networks (Holdings) Limited            |
| 10445236       | Electricity North West Services Limited                       |
| 07382637       | Electricity North West (Construction & Maintenance) Limited   |
| 08374655       | NWEN Finance plc  |
| 06872880       | NWEN Group Limited  |
| 06428375       | North West Electricity Networks plc                           |
| 06873051       | ENW Capital Finance plc                                       |
| 06845434       | ENW Finance plc   |
| 02366949*      | Electricity North West Limited                                |
| 06027314       | Electricity North West Number 1 Company Limited               |
| 10929718       | Electricity North West Property Limited                       |
| 13464314       | Electricity North East (Construction and Maintenance) Limited |
| 12619404       | CLASS Electricity Limited                                     |

\* Only Electricity North West Limited has turnover above £36m and is required under the Modern Slavery Act 2015 to produce an annual modern slavery statement.



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