Modern Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 31 March 2025.

Introduction

Ancala Water Services (Defence) Limited is committed to preventing slavery and human trafficking occurring in its organisation's structure, its business and its supply chains.

We will only do business with organisations who align with our Anti-Slavery Policy.

Our organisational structure and business

We service over 1,100 sites throughout England and Wales by delivering water, wastewater, fire system maintenance and specialist estate management services working in the Water - Utilities industry.

Our head office is at Unit 1B Redbrook Business Park, Wilthorpe Road, Barnsley, S75 1JN.

The nature of our business requires us to formally security screen all our employees which means the risk of employing victims is very low.

Nature of our supply chains

Our supply chain includes the provision of goods and services that support the delivery of water and wastewater services to our customers. We have risk assessed our supply chain and consider our business activities to be low risk and predominately based within the UK.

Policies relating to slavery and human trafficking

Our Anti-Slavery Policy reflects our commitment to implementing and enforcing effective procedures and controls to limit the risk of modern slavery and human trafficking occurring within our business or infiltrating our supply chains, and to acting ethically and with integrity in all our business activities and relationships.

We ensure that our suppliers are aware of our policies and take appropriate measures to ensure that our suppliers adhere to the same high standards.

Our policies have been developed internally and in conjunction with our internal Employee Forum and representatives, legal advisors, risk assessors and platforms.

Risk assessment

We risk assess our supply chain via our Supplier Pre-Qualification/Re Qualification process to assess which of our supply chain represents the highest risk in respect of

slavery or human trafficking. We also audit our key suppliers to ensure compliance with our terms and conditions. We assess our business activities to be low risk.

Our terms and conditions require all suppliers to comply with applicable laws, statues, regulations and our Anti-Slavery Policy. Failure to comply will result in a breach of contract and therefore rights for termination of any existing agreements.

Due diligence processes in relation to slavery and human trafficking

To monitor and mitigate the risks of modern slavery and human trafficking occurring within our supply chain, we undertake pre-screening of prospective Suppliers as part of our tender processes, to assess the effectiveness of their existing safeguarding controls and practices, including but not limited to, those in relation to preventing modern slavery occurring within their organisation and supply chain. Provision of associated policy documents and supporting documentary evidence is a requirement of this process.

Our contractual documentation incorporates specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour. In the event of any known or suspected incident in relation to slavery or human trafficking by an Associated Party, or failure to comply with these requirements may result in termination of any agreements.

We have in place the following policies, procedures and agreements which form part of our approach to mitigate against the risk of modern slavery within our company or our supply chain:

- Anti-Slavery Policy
- Code of Ethics
- Whistleblowing Policy
- Equal Opportunities Policy
- Anti-harassment Policy
- Grievance Policy and Procedure
- Supplier Onboarding and Re-qualification Procedure and Policy

Our processes did not identify any incidents of slavery nor human trafficking in the financial year ending 31st March 2025.

Staff Training

Key staff are required to complete modern slavery training to ensure that they understand the risks of modern slavery and human trafficking infiltrating our business or supply chains and effectively apply our policies and procedures aimed at mitigating this risk. We also require our contractors, agents and suppliers to provide such

training to their own staff. We make specific provision in our Whistleblowing Policy for the protection of individuals who report concerns about suspected wrongdoing.

Monitoring of our Anti-Slavery Policy

We intend to use the above and internal procedures to monitor how effective we have been in ensuring that slavery or human trafficking is not taking place in any part of our business or supply chains.

The Company pledges to review on an annual basis the effectiveness of this statement to ensure that there are no slavery or human trafficking in our supply chains.

This statement was approved by the Board of Ancala Water Services (Defence) Limited on 27th May 2025.

Signed

Mike Howarth

Chief Executive Officer

Ancala Water Services (Defence) Limited