



Modern Slavery Act Statement 2026





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About us

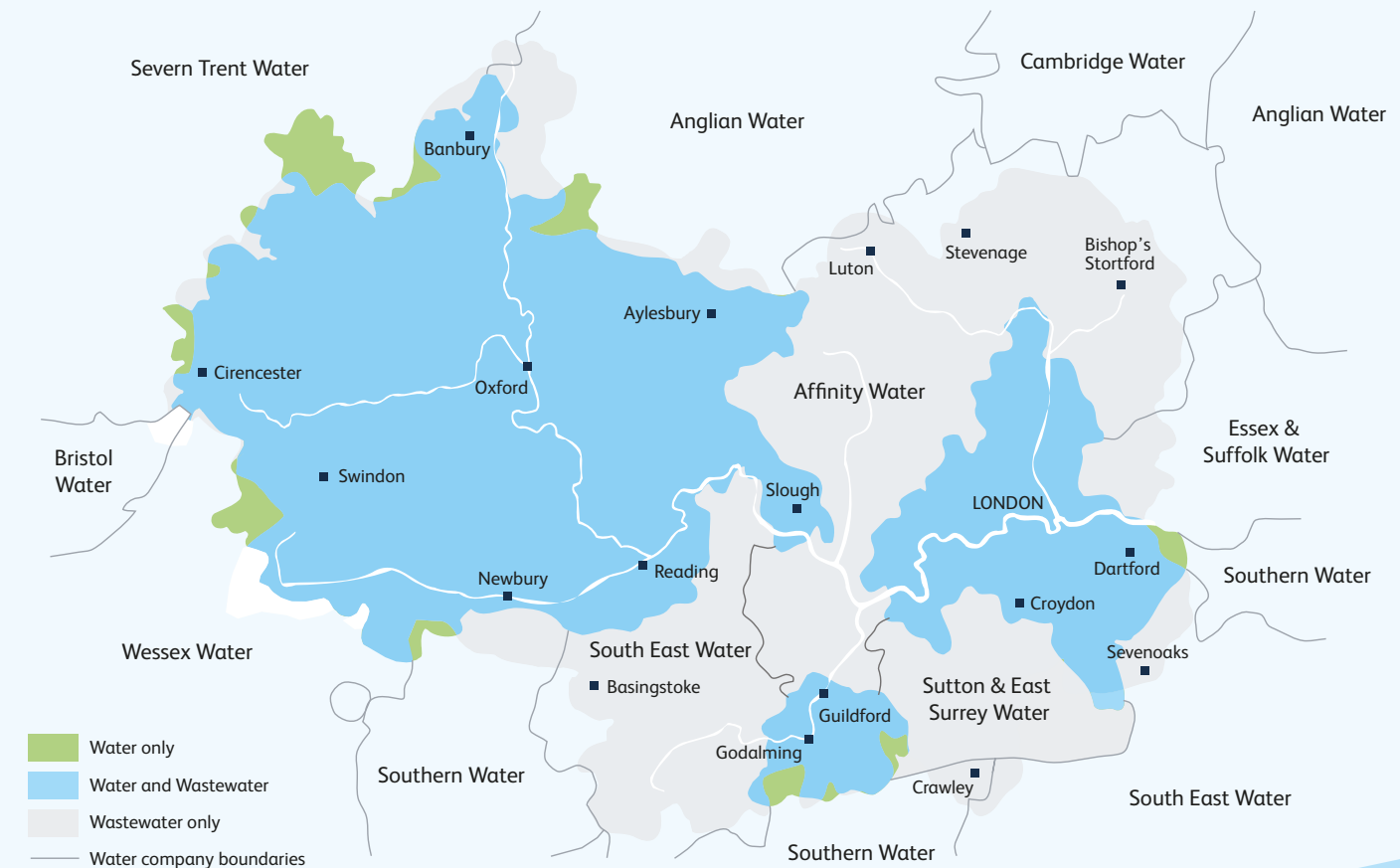
Our purpose is to deliver life’s essential service so our customers, communities and environment can thrive. We’re here to keep taps flowing for generations to come.

Thames Water Utilities Limited (‘Thames Water’) is the largest supplier of water and wastewater services in the UK only. We serve approximately **16 million customers** and manage and maintain **31,100km of water pipes** and **109,400km of sewers**. We move **2.5 billion litres of water** and **4.7 billion litres of wastewater** through our water cycle, every single day.

Our operating area follows the River Thames and stretches from Gloucestershire to Essex, covering countryside, villages, towns and our capital city of London.

By tackling modern slavery risks within our business and supply chain, and by empowering our employees to identify and report concerns, we can strengthen

the communities we serve, protect vulnerable individuals, and help ensure that employment opportunities throughout our region are safe, fair and free from exploitation. This commitment is an important part of how Thames Water creates social value and delivers for our customers, communities and the environment.



What is modern slavery?

Modern slavery includes practices such as **human trafficking, forced labour, debt bondage, and domestic servitude**. It is characterised by the loss of freedom and the exploitation of individuals through coercion, deception, or violence. According to Anti-Slavery International, modern slavery occurs when individuals are exploited by others, losing their autonomy and being subjected to inhumane conditions.

Currently, it is estimated that around **50 million people** are trapped in modern slavery worldwide, with **27.6 million** in forced labour¹. Of this 27.6 million, **17.3 million** are in forced labour exploitation in the private economy. This issue is not confined to specific regions; it exists globally, affecting individuals in various industries, including agriculture, construction, and domestic work. Vulnerable populations, such as migrant workers and those living in poverty, are particularly at risk.

Victims of modern slavery may exhibit signs such as fearfulness, malnourishment, or lack of control over their personal documents. They often work in poor conditions, face threats of violence, and may be coerced into performing illegal activities. The impact of modern slavery is profound, affecting not only the victims but also communities and economies at large.



Modern slavery is recognised as a serious crime under various legal frameworks, including the UK's Modern Slavery Act, which defines it to include slavery, servitude, forced labour, and human trafficking.

The Act consolidated existing slavery and trafficking offences into a single legislative framework, increases maximum penalties for offenders, improves protection and support for victims, enhances law enforcement cooperation, and introduces corporate transparency obligations.

¹ The source is the Global Estimates of Modern Slavery (2022) from **Walk Free, the International Labour Organization and the International Organization for Migration**.

Our statement

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 ('the Act') and sets out the steps that we, Thames Water have taken to secure that slavery and human trafficking are not taking place in our supply chain or any part of our business.

This is our ninth statement and outlines our processes and procedures to mitigate the risk of slavery and human trafficking during the financial year ending 31 March 2026.

To demonstrate transparency, our statement is published on our website and the UK government Modern Slavery Statement Registry.

To date, we have had no instances of modern slavery, or concerns raised. However, we remain committed to keeping our approach under ongoing review.



Our Policies

We remain committed to combating slavery or human trafficking in our supply chain or in any part of our business.

Modern Slavery forms part of our **Honest & Ethical Behaviour Policy**. This reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to safeguard against slavery and human trafficking taking place anywhere within our business or supply chain.

All employees, workers, suppliers and other service providers are responsible for acting in a manner consistent with this policy and its supporting standards.

We have a number of other policies and standards to define expected behaviours and values which include a People Policy, Procurement Controls and Assurance Framework, Employee Relations Corporate Standard and Flexible Working Corporate Standard.



Our honest and ethical behaviour policy

Policy no. POL028



[Read our Honest & Ethical Behaviour Policy](#)





Supply chain

Our direct supply chain includes more than **2,000 suppliers** of varying sizes and expertise levels, from major capital programme delivery and operational support to works, services and material supplies. Each playing a critical role in responsible delivery.

We paid more than **£3 billion** to our supply chain between April 2025 and March 2026.

Our supplier contracts include an explicit prohibition against the uses of forced or trafficked labour.

We expect all our suppliers to hold their own suppliers to the same high standards.

All suppliers are required to adopt and demonstrate their commitment to modern slavery and trafficking. We have systems in place to identify and assess potential risk areas within our supply chain and to mitigate any identified areas of risk. We encourage our suppliers and contractors to report any concerns that slavery or human trafficking may be, or is, taking place via our confidential 'Speak Up' Hotline.

Our standard procurement processes include a variety of checks and reviews designed to make sure that suppliers we engage with have the capability and capacity to comply with our policies and commercial terms. We also check that our contracts undergo appropriate assessment and have appropriate contract clauses in place.

Value chain >

Potential breaches >



Risk assessment

Onboarding

Each supplier with a turnover greater than £36 million, onboarded through a formal contractual arrangement or purchase order, is required to provide evidence that they have a current Modern Slavery Statement.



Annual refresh

The US Department of Labors Bureau of International Labor affairs (ILAB) maintains a list of goods and their source countries which has reason to believe are produced by child labour or forced labour in violation of international standards. Every other year they update their list and as of September 2024 there were 204 goods from 82 countries where such labour practices are prevalent.

Thames Water uses list of goods and countries defined by ILAB to identify the suppliers at risk and carry out a two-tier approach. In our last financial year ending 31 March 2026 we issued the following to our suppliers deemed high-risk:

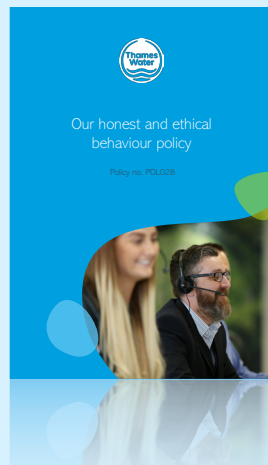
- 1 Supplier questionnaire with five specific modern slavery questions – issued to 306 suppliers who have spend over £100k, have formal contractual arrangements and have a turnover of more than £36 million.
- 2 Awareness email detailing our expectations of them working with Thames Water – issued to 256 suppliers with spend of less than £100k and no formal contractual arrangements in place.

Suppliers who fail to respond to the questionnaire are individually investigated and if appropriate blocked to prevent future orders being issued until the questionnaire or relevant evidence is verified.

Our employees

Thames Water employees more than **9,000 people** within the UK from scientists to invoice processors; engineers to customer service specialists; financial specialists to mechanical technicians.

To verify entitlement to work in the UK, we conduct Right to Work checks on all directly hired employees before they commence employment with us. Additionally, we use an independent third-party provider to undertake pre-employment screening, which includes identity verification and other relevant background checks.



All our employees are required to complete mandatory annual training on key policies, including the Honest & Ethical Behaviour Policy and the completion rates are monitored by our Executive Committee and Board. The completion rate at the end of the last financial year stood at 95.6 %.





Living wage and upskilling our workforce

At Thames Water, we believe that rewarding people fairly is fundamental to building thriving communities and a resilient workforce. We are therefore proud to be an accredited Real Living Wage employer which means that our directly employed colleagues receive a wage that reflects the true cost of living and supports them to flourish both at work and beyond.

We actively engage with suppliers, contractors and industry partners to support fair employment practices and to encourage approaches that promote financial wellbeing, inclusion and opportunity. We recognise the vital role that our supply chain plays in attracting, retaining and developing a skilled, motivated and sustainable workforce, particularly at a time when our sector continues to face recruitment and retention challenges.

Through the Infrastructure Strategic Skills Forum ('ISSF'), launched in 2025, we work collaboratively with our supply

chain, education providers and other stakeholders to promote responsible employment practices, support workforce upskilling and help develop sustainable talent pipelines across the sector.

By fostering constructive dialogue and sharing good practice, we aim to support employers in creating working environments where people can build rewarding careers and contribute to long-term organisational success. While we recognise that there is still more to do, this reflects a growing understanding of the positive impact that fair pay can have on individuals, families, businesses and communities alike.

We continue to work proactively with the Living Wage Foundation and other stakeholders to better understand the opportunities and barriers associated with wider adoption of the Real Living Wage.

Through this engagement, we aim to promote employment practices that help people thrive, strengthen local communities and support the long-term resilience, sustainability and prosperity of the sectors and communities we serve.





Training

Mandatory Training

- Our honest and ethical training is mandatory for all Thames Water employees
- The training is delivered via an e-learning module, which includes a specific section on Modern Slavery
- As part of the training each employee must confirm they've read and understand the Honest and Ethical Behaviour Policy (H&EB policy)
- The module is reviewed and refreshed annually so that content remains current and relevant
- To maintain awareness, all employees are required to complete the training on an annual basis

Targeted role-based training

- Targeted training is provided for our purchasing team, senior category managers, category managers, sourcing managers, and contract managers to help identify high-risk commodities and services before procurement activities begin
- During this reporting period we transitioned from classroom and virtual training to an e-learning format. Improving accessibility and compliance by enabling employees to complete the training at their convenience and revisit the content if required
- All relevant employees are required to complete the training annually
- Although mandatory for key roles, the module is available for everyone in Thames Water



Assurance and controls

Our risk management processes identify, assess, monitor, and report on risks, including compliance with our obligations. We assess the effectiveness of the controls in place; the impact of these risks should they materialise and the likelihood of this happening.

We follow the established ‘three lines’ model to enable an effective relationship between risk, control and assurance, ensuring clear accountability and responsibility throughout. While drafting this statement, we considered the results of ongoing monitoring of controls, undertaken by each line, as well as the outcomes from our risk management process.

1

First line

Business units have accountability for identifying and managing risks, in line with the agreed risk appetite.

Directorate risk reviews support the prioritisation of risk information upwards to the Risk Committee and ARRC

2

Second line

The Enterprise Risk Management function provides independent oversight, expert challenge and monitors first line adherence to the Risk Management Framework among other policies and standards

3

Third line

Internal Audit delivers additional assurance over the effectiveness of the first and second lines and maintains a direct reporting line to the ARRC

Evaluating our performance

We have key performance indicators (“KPIs”) in place to measure our performance and effectiveness in combatting slavery and human trafficking which we achieved for the financial year-ending 31 March 2025. We will continue to measure these in the next financial year.

Measure	Target	FY24/25	FY25/26
Company-wide employee training	90 %	96.8 %	96.4 %
Role based training (now moved to online Learning on Tap module)	90 %	89.4 %	97.4 %
Tender pre-qualification questions answered appropriately and tested	99 %	100 %	100 %
Appropriate contractual arrangements tested	99 %	100 %	100 %
Investigations into any potential breaches, and where appropriate, report on any potential breaches within the defined timescale	N/A	0	0



Reporting concerns

Thames Water recognises that modern slavery can be hidden and difficult to detect. To help identify potential cases within our business and supply chain, we encourage employees, contractors and suppliers to report any concerns. This allows concerns to be raised safely, investigated properly, and acted upon.

Our Speak-Up line is available 24 hours a day, seven days a week to our employees, contractors and suppliers. At Thames Water we also have a dedicated Business Integrity and Investigations Team who investigate all instances on dishonest, criminal and unethical behaviour by employees, contractors or organised criminals.

No issues related to modern slavery or human trafficking have been reported to our Speak-Up line or our Business Integrity and Investigations team during the last 12 months, nor previously.



Outside of Thames Water, the following is available for reporting concerns:

Modern Slavery Hotline **0800 0121 700**

- Independent charity
- Free, confidential support open 8am to 9pm, 365 days a year
- Support available in 200 languages

Anyone in immediate danger Call **999**



Continuous improvement

Over the next 12 months we will continue to build on the actions already taken and further strengthen our efforts to reduce modern slavery risks across Thames and our supply chain.

Modern Slavery Awareness Week	Policies and operating procedures	Supplier due diligence
• Target key messages to employees through various internal communication routes • Communicate key messages and reinforce expectations to all suppliers, not just those deemed high-risk	• Perform a review of all documentation that references Modern Slavery	• Define a plan for increased assurance checks • Build on our relationship with Slave Free Alliance



Board endorsement

Thames Water's Executive team and Board have overall responsibility for making sure our Honest & Ethical Behaviour Policy reflects our legal and ethical obligations, and that our employees and support partners adhere to it at all times.

This document constitutes Thames Water's Slavery and Human Trafficking Statement for the financial year ending 31 March 2026.

This Statement was reviewed and approved by the Thames Water Utilities Limited Board of Directors at its meeting on 30 September 2026 and is signed on its behalf by:



Chris Weston
Chief Executive Officer

