

# MODERN SLAVERY STATEMENT

2025

# 1. INTRODUCTION

## The Veolia Environnement SA group of companies are global leaders in ecological transformation.

Present on five continents and with nearly 218,000 employees, Veolia designs and deploys innovative and practical solutions for managing water, waste and energy.

In the UK, Veolia operates across the water, energy, and waste sectors, providing essential services to private and public customers. With over 14,000 employees, this footprint across three key industries gives Veolia a unique opportunity to combine expertise and to help protect our planet and improve quality of life.

This statement sets out the steps taken by our business to detect and prevent modern slavery in our operations and supply chains. It outlines our plans to continually improve how we manage modern slavery risks and advance initiatives to raise awareness.

Should we ever identify instances of modern slavery within our operations or supply chain, we will work with the appropriate authorities to ensure support in accessing remedies, compensation, and justice for victims.



**GAVIN GRAVESON**

Chief Executive Officer, Veolia UK & Ireland and  
Senior Executive Vice-President, Veolia Northern Europe

21 May 2025

This statement is made under section 54(1) Modern Slavery Act 2015 and constitutes Veolia’s Modern Slavery and Human Trafficking statement.

Under Home Office guidance, this statement sets out the measures that Veolia has in place in the UK and the actions we have taken, during the twelve months to 31 December 2024.

For this statement, “Veolia” and “Veolia UK” mean Veolia ES Holdings (UK) Limited, Veolia Water UK Limited, and Veolia Energy UK Limited with their UK subsidiaries.

This includes, but is not limited to the subsidiaries identified below:

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| <ul style="list-style-type: none"><li>• Veolia Energy and Utility Services UK Limited</li><li>• Veolia Water Outsourcing Limited</li><li>• Veolia ES (UK) Limited</li><li>• Veolia Environmental Services Group (UK) Limited</li><li>• Veolia ES Staffordshire Limited</li><li>• Veolia ES South Downs Limited</li><li>• Veolia ES Shropshire Limited</li><li>• Veolia ES Sheffield Limited</li><li>• Veolia ES Landfill Limited</li><li>• Veolia ES Hampshire Limited</li></ul> | <ul style="list-style-type: none"><li>• Veolia ES Birmingham Limited</li><li>• Veolia ES Nottinghamshire Limited</li><li>• Veolia ES Southwark Limited</li><li>• Veolia ES Merseyside and Halton Limited</li><li>• Hampshire Waste Services Limited</li><li>• South Downs Waste Services Limited</li><li>• Sheffield Environmental Services Limited</li><li>• Stirling Water Seafield Limited</li></ul> |
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Common standards, policies, and procedures are adopted and implemented across Veolia UK entities. Veolia UK entities are supported by centralised functions including supply chain, human resources, compliance, risk and assurance, and sustainability.

## 2. OUR STRUCTURE AND BUSINESS

### 2.1 Structure and Business

Veolia UK, as part of the Veolia Group, designs and delivers environmental solutions that contribute to its purpose of ecological transformation.

Veolia works to radically change patterns of production and consumption by placing ecology at the heart of every process and every assessment. We aim to provide meaningful solutions to major problems, with and for our stakeholders.

We directly employ more than 14,000 people in the United Kingdom, across more than 400 operational and corporate shared services sites.

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### 2.2 Governance

Our Executive Committee is responsible for considering, discussing, consulting on, and implementing Veolia UK's strategic direction.

The Executive Committee meets regularly and is assisted by several specialist committees and groups focusing on important topics, including Modern Slavery and Human Trafficking.

Our Modern Slavery Working Group ("MSWG") assesses and manages risk by conducting risk mapping, implementing improvements, and monitoring progress against a defined set of KPIs and an action plan driven by the risk mapping. The MSWG comprises a cross-section of HR, Supply Chain, Operations, Legal, Compliance, and Sustainability representatives. Our Modern Slavery Lead is the Chief Compliance Officer.

In 2024, the MSWG met on five occasions, with individual members meeting more frequently to drive specific projects and initiatives.

The MSWG reports to the UK Modern Slavery Executive Subcommittee, which comprises the Chief HR Officer, Chief Legal Officer, and Chief Operating Officer for UK Treatment Operations.

The MSWG meets with the Executive Subcommittee twice yearly. The Chief Compliance Officer also regularly updates the Audit and Compliance Committee, which is attended by the Chief Executive Officer, Veolia UK&I.

## 2.3 Supply chains

Veolia spends around £1.3 billion annually in the UK across all suppliers. In 2024, over 92% of spend was with UK-based suppliers.

We recognise that the volume and complexity of suppliers can present a higher risk of undetected modern slavery. To assess potential risks in our supply chain, we perform an annual modern slavery risk assessment using reputable indices available in the market.

Where risk is identified, we conduct internal and external audits to drive the identification and remediation of potential issues.

Supplier expenditure is categorised as shown in **Table 1**. Our Supply Chain National Category Managers are responsible for each category.

Category	Category name	Typical products/services in the category
1	Operating suppliers, material and equipment	Valves, tools, pipes and fittings, pumps, engines, electrical, safety, laboratory, building materials
2	Industrial, technical and service subcontracting	Waste and treatment subcontracting, transport and logistics providers, civil engineering, facilities management, lab services
3	Mobile equipment and motorised equipment	New vehicles and spare parts, onboard equipment, bins and containers
4	Fuel, energy and chemicals	Electricity, Gas, Acids, Alkalis, Polymers, Diesel, Fuel Additives
5	Intellectual services	Insurance, technical and general managed consultants, legal providers, recruitment consultants, marketing agencies
6	General Purchasing	Temporary labour, travel, office supplies and furniture, postage and archiving
7	IT and telecommunications	IT hardware and software, mobile phone and airtime

Table 1



# 3. SUPPLIER DUE DILIGENCE PROCESSES CONCERNING MODERN SLAVERY AND HUMAN TRAFFICKING

Veolia is committed to the prevention and detection of slavery and human trafficking in its supply chains. The following practices are in place to drive our commitment:

## 3.1 Supplier assessment

Before onboarding, all new goods and service providers (including subcontracted works providers) must answer a set of questions to evaluate their compliance standards across health and safety, environmental impact, human rights (including modern slavery) and business ethics.

Where standards are deemed insufficient, supplier applications are subject to further review, in consultation with the appropriate Veolia subject matter experts. Suppliers must sign Veolia's Supplier Charter (as displayed on our Veolia UK website, on the supplier information page) to demonstrate their commitment to operating according to Veolia's purpose and values.

A supplier who does not meet the requirements of the UK Modern Slavery Act 2015 or who does not sign up to our Supplier Charter will not be allowed to trade with Veolia until they satisfy, or actively work with us to meet, these requirements.

To assess labour and human rights standards across key suppliers who already work for Veolia, we use the EcoVadis platform. Veolia will work collaboratively with those who do not meet the standards defined in our Supplier Charter, to agree on actions and implement improvement plans.

## 3.2 Terms and Conditions

Veolia uses several sets of standard terms and conditions to trade with suppliers. These conditions oblige the supplier to comply with the Modern Slavery Act 2015 and give Veolia the right to require evidence to show how the supplier mitigates the risk of modern slavery.

We will always aim to support and work with suppliers to address modern slavery risks, but we retain the ultimate sanction of contract termination where necessary.



## 4. POLICY AND PROCESS

**Veolia's commitment to the prevention and identification of modern slavery is outlined in our Modern Slavery and Human Trafficking Policy and Procedure as well as our Supplier Charter. Common standards, policies, and practices are adopted and implemented throughout Veolia UK operations.**

Our Whistleblowing Policy and Procedure are communicated to all employees. Confidential whistleblowing channels, including a telephone line and a digital platform, are also shared via our intranet, website, and site posters visible to employees and third parties. The confidential reporting mechanisms are independently operated by third parties and supported by a clearly defined reporting and investigation process for managing all alerts.

We also offer an Employee Assistance Programme providing employees with access to confidential advice and information on many topics.

## 5. SUPPLY CHAIN RISK AND RISK MANAGEMENT STEPS

**In 2024, Veolia purchased goods from 22 different countries, with over 92% of expenditure in the UK.**



The modern slavery and human trafficking risk for each of these countries was assessed using reputable sources before entering into trading relationships. Each year, several suppliers deemed to be exposed to higher risks are selected for audit.

Our business employs a large and diverse operational workforce and employs contingent labour which we are aware carries inherent risk. We continue to work with our contingent labour service provider to enhance processes to increase our ability to prevent and detect modern slavery risk as outlined in section 6.2 below.

Direct employee checks for TUPE staff follow the steps outlined in 6.1 below. Contingent labour requirements are managed through our contingent labour service provider.



## 6. DIRECT AND INDIRECT EMPLOYEES

### 6.1 Direct labour and TUPE employees

Veolia employs over 14,000 individuals in the UK on direct employment contracts. All employment contracts comply with UK legislation.

Wages are paid electronically directly to employee bank accounts. Veolia will not onboard a new employee until Right to Work documentation has been received, reviewed, and validated against Home Office guidance. For new hires, documentation is collected through an electronic form on the HR and Payroll system. For employees transferring to Veolia under TUPE arrangements, the Right to Work evidence is obtained within 21 days as per Home Office guidance.

To mitigate the risk of an employee's pay being diverted to a third party, the following scenarios are reviewed: more than one employee's salary being paid to the same bank account, more than two employees residing at the same address, and multiple employees in a given postcode. Legitimate cases of co-habiting partners working for Veolia are checked and validated.

Veolia works in partnership with five Trade Unions to determine specific terms of employment for our employees covered by collective bargaining agreements. This may include pay, hours, leave, and health and safety policies. Veolia complies with the legislative requirements of the National Minimum Wage and the National Living Wage.

### 6.2 Indirect labour (temporary and agency workers)

Veolia uses a Contingent Labour Service Provider ("CLSP") for temporary labour requirements. Our CLSP is contractually required to ensure they and their suppliers comply with the Modern Slavery Act 2015. The CLSP engages staff through a national agreement with an approved list of panel agencies, providing contingent labour for predominantly frontline operational roles.

In 2024, 5896 workers were supplied to Veolia under the CLSP arrangement. The CLSP has a Service Level Agreement with the panel agencies requiring them to comply with all regulations and laws applicable to the terms of the agreement, including the Modern Slavery Act 2015.

The CLSP's onboarding process ensures that all workers supplied to Veolia hold valid Right to Work documents. Retrospective documentation audits are also performed. We also work with our CLSP to enhance processes to increase our ability to prevent and identify potential modern slavery cases.

# 7. MEASURING OUR EFFECTIVENESS

The Veolia Group multi-faceted performance framework focuses on 15 audited indicators aligned with the United Nations Sustainable Development Goals. These indicators include measuring the impact of our contribution to society and ethics standards. The indicators are underpinned by the Veolia Group’s 2024-27 GreenUp strategy, purpose, mission, and values.

The MSWG is responsible for assessing, enhancing, and monitoring steps taken by Veolia and its suppliers to meet compliance standards and to identify and manage risk.

Key performance indicators drive training delivery and completion, awareness campaigns, policy relevance, third-party audit scheduling and resulting actions. These are shared with the Executive Subcommittee.

Representatives of the MSWG actively engage and participate in external groups, including the Modern Slavery Leaders Group at the Supply Chain Sustainability School.





## 8. TRAINING AND AWARENESS

### 8.1 Executive Management

The dedicated Modern Slavery Executive Subcommittee meets twice yearly with the MSWG representatives to review priorities and action plans.

Modern slavery is also discussed as a recurring agenda item during the Audit and Compliance Committee, held every four months and attended by members of the Executive Committee, including the Chief Executive Officer, Veolia UK&I.

### 8.2 Managers, Supervisors, and their teams

Modern slavery eLearning is available to all staff. The eLearning module provides an overview of modern slavery risks, statistics, and guidance on how to spot the signs of modern slavery and report concerns safely. It is actively promoted to all staff annually as part of the annual anti-slavery awareness day. Completion is mandated for those working in areas of the business identified by our risk mapping process as more exposed to the risk of modern slavery. It also forms part of the induction process for all new employees.

The training module contains a scored test to support the level of understanding following completion. A new module was developed and launched in 2024.

Live virtual training is also made available periodically, and at least every three years, with a training partner.

### 8.3 Frontline Operations

Our frontline briefing was launched to operational managers for delivery to frontline teams across all UK operations in 2023. The briefing shares a video of a victim's story and is supported by the presence of our posters. The briefing provides clear signposting to our modern slavery policy and procedures and is expected to be launched every two years.

### 8.4 Suppliers

As a Supply Chain Sustainability School partner, Veolia is now collaborating with the school to conduct a Modern Slavery workshop for our key suppliers. The workshop offers guidance on how to identify the signs and risks of slavery within the supply chain and includes various reporting mechanisms.





# 8.5 Posters

Two types of posters are displayed across our offices and operational sites. The first poster (spot the signs) is for display in communal areas. The second poster (how to seek support for victims) is for display in private areas. Both posters guide how to raise concerns and seek help.





# 9. OUR JOURNEY AND FUTURE PLANS



