

## **Modern Slavery Statement**

### **Modern Slavery**

Everflow takes its responsibility under the Modern Slavery Act 2015 extremely seriously and is a certified Living Wage Employer. No instances of modern slavery were identified or reported within our business or supply chains during 2025, and no concerns were raised through our whistleblowing channels. We recognise that this does not mean the risk is absent, and we are committed to continuing to strengthen the steps we take to identify, prevent and address modern slavery in our business and supply chains.

This statement is made on behalf of Everflow and its subsidiaries pursuant to section 54 (1) of the Modern Slavery Act 2015 (the Act) and constitutes the Group's slavery and human trafficking statement for the financial year ended 31<sup>st</sup> December 2025. It covers Everflow Holdings Limited and each of the subsidiaries listed at the end of this statement. Everflow recognises that modern slavery and human trafficking are significant issues presenting a challenge for businesses. We are committed to improving our practices to combat slavery and human trafficking. We take a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in our business dealings.

Everflow is a multi-utility company serving business customers in the UK across water, waste and telecoms. It employs 224 people, all based in the UK. We have no material suppliers operating outside the UK; those that do are multinational organisations whose own modern slavery practices we can confirm.

### **Our policies on slavery and human trafficking**

To reflect our commitment to acting ethically and with integrity in all our business relationships, minimising the risk of modern slavery, we have established the following policies:

- Slavery and Trafficking Policy
- Anti-bribery Policy
- Whistleblowing Policy
- Supplier Code of Conduct

We are also dedicated to implementing and enforcing effective systems and controls to prevent slavery and human trafficking from taking place.

The Slavery and Trafficking Policy and the Supplier Code of Conduct were reviewed in April 2025, and again in October 2026.

### **Employment practices**

We rigorously check all our employees have the right to work in the United Kingdom and are paid at or above the Real Living Wage set by the Living Wage Foundation. We work with our supply chain to ensure similar checks are carried out in relation to temporary and agency workers.

In addition to the employment rights and benefits which are provided to employees, our Contracts of Employment and Company policies make clear to all employees what actions

and behaviours are expected of our people. All new starters receive modern slavery training as part of their induction, with refresher training where relevant to their role, including for employees involved in procurement, to ensure that procurement activities and decisions include consideration of these issues. In 2025 and 2026, modern slavery compliance training was also completed across the business.

### **Our supply chain**

Our supply chain includes providers of:

- Water and wastewater services
- Waste collection services
- Business-critical internal services such as equipment, IT, and software programmes
- Customer-facing services such as meter readers, water efficiency experts, and other value-added service providers
- Customer engagement services such as field sales agents, brokers, and third-party intermediaries
- Facilities and office services such as cleaning, catering, travel and events
- Outsourced sales, telesales and lead generation services
- Telecoms network and connectivity services.

In 2025 we paid 890 suppliers. Our spend is concentrated with large, regulated organisations: 94% of supplier spend was with water and wastewater wholesalers, 2% with brokers and other intermediaries, 1% with waste collection partners and 3% with all other suppliers.

Our understanding of our supply chain is based on our direct (tier 1) suppliers. We have not yet mapped indirect (tier 2 and below) suppliers, for example the manufacturers of the IT hardware we buy.

### **Due-diligence process for slavery and human trafficking**

We undertake an annual risk-based review of our supply chain, using spend data for every supplier paid in the year, to highlight any areas where we believe there is a heightened risk of slavery and human trafficking. We assess risk by country, sector, the nature of the workforce and the type of business relationship. As we operate solely in the UK and the large majority of our spend is with regulated wholesalers, we consider our overall risk to be low.

Our 2025 review identified waste collection as the main area of higher inherent risk, as the waste and recycling sector is recognised as higher risk for labour exploitation. We manage this through onboarding checks on every new waste supplier and a dedicated supply chain manager and team who oversee the conduct of our waste providers, supported by performance indicators on collection rates and service levels. We also monitor outsourced office cleaning, and the purchase of IT hardware, where the risks sit further down the supply chain.

We track the following indicators, which we will develop further in 2026: the number of modern slavery concerns raised through our whistleblowing channels (2025: none); the completion of modern slavery training by new starters, which we will report from 2026; and

our supplier payment performance, as late payment can put pressure on suppliers and their workers. In 2025 we paid 97% of invoices within 30 days in the first half of the year and 96% in the second half, with average payment times of 15 and 19 days respectively. We have also reviewed our existing key performance indicators for any indications that these would encourage behaviours associated with modern slavery or human trafficking, and have not identified this to be the case.

### **Reporting concerns regarding slavery or human trafficking**

We foster a culture where our people are encouraged to raise concerns about unlawful, unacceptable practices or misconduct and can do so safely without fear of reprisal. We offer our full support to those who raise a concern in good faith. Individuals can confidentially and anonymously report a concern to our HR department. Anyone working in our supply chain, or any member of the public, can also report concerns confidentially to the Modern Slavery and Exploitation Helpline on 08000 121 700.

If a concern is raised, it will be investigated under the oversight of our Chief Financial Officer and, where appropriate, reported to the relevant authorities, with the safety and welfare of the people affected as our first priority.

Our Whistleblowing Policy ensures our people know how to raise concerns about any unethical practices within our business and supply chain without fear of recrimination.

### **Responsibility and approval**

The Board of Everflow Holdings Limited has overall responsibility for this statement. Day-to-day responsibility for our approach to modern slavery sits with James Cleave, CFO.

This statement was approved by the Board of Everflow Holdings Limited on 7 October 2026 and is signed on its behalf by James Cleave, Chief Financial Officer and director.

A handwritten signature in black ink, appearing to read 'James Cleave', with a stylized flourish underneath.

James Cleave  
Chief Financial Officer  
Everflow Holdings Limited and its subsidiaries, Everflow Limited, Everflow Operations Limited, Everflow Tech Limited and Everflow Telecoms Limited  
7 October 2026