

Anti-Slavery and Human Trafficking Statement 2026

United Utilities Group PLC
United Utilities Water Limited



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Executive summary



Our purpose is to provide great water for a stronger, greener, and healthier North West.

By keeping modern slavery out of our supply chain and helping partners and colleagues to spot the signs, we can create stronger, more resilient communities – supporting our most vulnerable customers and providing secure employment across our region.

We have a responsibility to contribute positively to the communities we serve, and to provide a safe and great place to work. Our commitment to eradicating modern slavery is central to how we act responsibly and support these communities, working with our supply chain, partners and colleagues to create a legacy for the North West that we can be proud of.

The most recent figures from the [Global Slavery Index](#) (produced by the International Labour Organization (ILO), Walk Free and the International Organization for Migration (IOM)) estimate that 50 million people were trapped in conditions of slavery on any given day in 2021 (the most recent year for which data is available), an increase of 10 million people since 2016. Of this statistic, 27.6 million people were in forced labour. We will continue to engage closely with our supply chain and anti-slavery groups to identify modern slavery risk.

This statement is prepared in accordance with the Modern Slavery Act 2015 and its definition of modern slavery, including human trafficking.

Last year we said we would:	This year we have:	Insight and commitment:
Continue to target the remaining proportion of our colleagues operating within communities to complete the modern slavery awareness e-learning course.	Achieved 97% completion of the modern slavery awareness eLearning among colleagues operating in relevant community-based roles	We're working with the Slave-Free Alliance (SFA) to update and strengthen our e-learning so that it reflects best practice and supports colleagues in relevant roles. As we enhance the module, we will continue to target colleagues who have not yet completed the course to ensure consistent awareness of modern slavery risks.
Continue to execute our strategic training plan including targeting colleagues in key positions with training tailored to their job role.	Partnered with SFA to deliver targeted training and awareness sessions for colleagues in key roles, including executive and senior-leader briefings, as well as a procurement focused workshop.	Working in partnership with SFA, we will continue to progress our strategic training plan by targeting colleagues in key positions with tailored training.
Engage with SFA to develop additional questions to be incorporated into the existing audit question sets for use on our construction sites.	Engaged with SFA to develop a standardised format for audits at construction sites, to assess they are aware of and have effective measures to combat modern slavery in relation to their works including adherence to their own internal policies. This has become particularly relevant due to the increased volume of contractors.	We will partner with Slave-Free Alliance to conduct site assessments on a sample of our construction sites during 2026/27.

Executive summary



We have an extensive set of policies and procedures which are monitored and updated. These aim to ensure that our employment and commercial practices prevent forced, compulsory or child labour, as well as any form of human trafficking. We are committed to building on our actions and improving our processes, training and policies to prevent the possibility of exploitation within our supply chain and build our capability to respond to the risks. This year, we introduced our [Supplier Code of Conduct](#) to set out our shared standards and expectations for all suppliers across our supply chain, and this will be shared with suppliers as part of their onboarding process. This sits as part of our broader codes of conduct which are [signposted on our corporate website](#) to ensure we behave with integrity towards all our stakeholders.

This year, we placed a strong emphasis on building a deeper organisational awareness of modern slavery through a range of targeted initiatives, including tailored briefings from SFA for our executive team and ‘spot the signs’ sessions delivered during Anti-Slavery Week. This was supported by wider awareness-raising activities that reinforce the importance of identifying and responding to modern slavery risks.

We have continued to address areas where we have identified a higher risk of modern slavery potentially occurring within our supply chain and have kept abreast of industry developments to highlight emerging risk areas.

In June 2025, we worked with our external partner Slave-Free Alliance to complete an in-depth review of our procurement categories to better understand any known or suspected risk areas, and develop a risk profile for each category. This provided key findings, risk areas and recommendations on how to improve which have been implemented and reviewed this year.

We have strengthened our relationship with SFA, partnering with them on a number of events hosted by United Utilities and SFA. This has included attendance at AMP8 (2025–30) partner events, Slave-Free Alliance annual conference and Modern Slavery Awareness Week site training events.

We have retained our Corporate Ethics Mark from the Chartered Institute of Procurement and Supply (CIPS) for the sixth year, as a result of targeted training for our commercial colleagues. We aim to retain the CIPS Corporate Ethics Mark again in 2026 to ensure our commercial colleagues are equipped to meet the challenges of modern slavery and human trafficking.

Whilst we reflect on some positive progress this year, we are committed to addressing the global issue of modern slavery, and ensuring that within our own operations, in the communities we serve and within our supply chains we do the utmost to protect those that need it most.



Overview of our business

United Utilities provides water and wastewater services to around eight million people and 200,000 businesses in the North West of England. The group's principal subsidiary, United Utilities Water Limited (U UW) operates solely in the UK.

We directly employ over 7,300 people to deliver these services – from engineers to customer service specialists; scientists to financial experts. United Utilities has an employee relations framework in place and colleagues can join one of four trade union bodies that we recognise and with whom we have regular and constructive engagement through a number of forums. We also rely on over 700 agency workers, engaged through a recruitment agency, as part of our people strategy.

Our financial year, and the period covered in the statement, is from 1 April 2025 to 31 March 2026, during which our revenue was £2.6 billion.

Oversight of human rights and modern slavery governance

As Chief Executive Officer, Louise Beardmore has overall responsibility for ensuring compliance with human rights and modern slavery legislation and related best practice, with oversight from the board ESG committee.

Our Modern Slavery and Human Rights Working Group meets monthly to assess our approach and address any issues. The group comprises representatives from the following functional areas: Legal, People, Commercial, Corporate Affairs, Audit, Assurance, Health & Safety, Technology Services and Customer. This governance structure supports a coordinated and proportionate approach to identifying, assessing and addressing modern slavery and human rights risks across our operations and supply chain, in line with our purpose, values and corporate policies. This year the group has continued to review and assess any potential risk areas that may impact our colleagues, suppliers, customers and communities in which we operate, and to monitor the effectiveness of existing controls.

In the coming year, we will continue to work with SFA on our audit practices and to update and strengthen our e-learning. We will also continue to implement any further recommendations from the SFA Gap Analysis as part of our ongoing commitment to continuous improvement.



Our supply chain



In the last financial year, United Utilities has spent around £1.9 billion with approximately 1,900 suppliers, from major international corporations to sole traders. The majority of our suppliers are based in the UK but we also source goods and materials from countries around the world. We support 30,000 jobs and contribute £35 billion of economic value to the North West.

We procure work, goods and services ranging from infrastructure capital investments, through to operational spend on chemicals and energy, to the use of professional IT services.

Our approach to engaging with our supply chain is to conduct all dealings with integrity and fairness, and to ensure compliance with all legal and ethical requirements in conducting our business.

Creating value for suppliers

We measure progress on delivering value for all our stakeholders and make the information available in our integrated annual report and accounts.

A key performance indicator for supplier payments is 'invoices paid within 60 days'. Our Duty To Report figures show that we continue to pay our suppliers on time. As of March 2026, the figure was 98% of supplier payments made within 60 days.

We are a signatory to the Prompt Payment Code and report on our payment performance on an annual basis. By paying our suppliers promptly and within the agreed payment terms we aim to minimise the risk of unethical practices within our supply chain.

The transition to AMP8 has allowed us to review our performance indicators and re-align our five-year targets to ensure alignment with our supply chain commitments, these targets will be monitored throughout AMP8 with a focus of activity to drive performance.

These performance indicators are reflected in our Annual Report and those specific to supply chain activity include:

- Percentage of our commercially managed suppliers delivering strong KPI performance or a corrective action plan in place to remediate, reporting score of 76% against our year one target of 75%. This means we are on track to meet our target of 95% by 2030.
- Percentage of commercially managed suppliers compliant with responsible sourcing principles, reporting score of 76% against our year one target of 75%. This means we are on track to meet our target of 95% by 2030.

- Percentage of managed suppliers that have been subject to an enhanced audit within the lifecycle of their contract: reporting score of 2% against our year one target of 2%. This means we are on track to meet our target to audit 10% of our supply chain across AMP8 between 2025 and 2030.

Up-to-date supplier risk assessments and annual reporting scores for our strategic suppliers who are critical to the company's ability to deliver safe and efficient services, enable our teams to apply targeted risk management strategies to identify and mitigate risks in a proportionate and relevant manner. We also maintain and promote our United Supply Chain responsible sourcing principles and closely monitor adoption by our targeted suppliers. This aims to create a high-quality supply chain and support suppliers to enhancing their performance both with our area of operations in the North West and beyond. Further details on our United Supply Chain initiative can be found [on our website](#), and you can also read more in this document under 'Managing our supply chain'.

Our policies to address human rights and modern slavery



We are committed to protecting the human rights of our colleagues, and those working on our behalf in our supply chain. Our [human rights policy](#) recognises our support for all the rights and freedoms set out in the articles of the Universal Declaration of Human Rights, and the four commitments set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

We have a comprehensive suite of internal employment policies that support the prevention of modern slavery among all people in our employment, including:

- **Agency worker**

Supports the prevention of modern slavery by safeguarding agency worker rights by upholding the principles of equal treatment provided for under the Agency Workers Regulations 2010.

- **Equality and diversity**

Promotes a fair and inclusive culture where discrimination and unequal treatment are not tolerated.

- **Esteem in the workplace**

By setting clear expectations and a zero-tolerance stance on bullying and harassment, this policy helps safeguard individuals from behaviours that may be associated with exploitation.

- **Family-friendly and special leave**

By enabling colleagues to balance work with family and personal needs, this policy helps minimise personal vulnerability, helping to safeguard against circumstances that may lead to exploitation.

- **Grievance**

Provides a safe, formal route for colleagues to raise concerns, helping to surface issues or behaviours that may indicate exploitation.

- **Maternity, paternity, shared parental and adoption leave**

Through protected leave and enhanced pay (for maternity, paternity and adoption leave) this policy supports financial stability during major life events helping to reduce vulnerability to exploitation.

- **Mental wellbeing**

By supporting colleagues' mental health through a holistic range of wellbeing services, this policy helps create conditions where exploitation is less likely to go unnoticed or unchallenged.

- **Safeguarding and prevent**

By setting clear commitments and procedures for safeguarding children, and adults at risk, this policy helps ensure that signs of exploitation are quickly recognised and acted upon.

- **Social and interactive media**

By reinforcing respectful online behaviour and intolerance of harassment this policy supports a safe and inclusive culture where concerns can be raised confidently.

- **Whistleblowing**

This policy provides a safe, confidential, route for colleagues to report concerns, helping to ensure that signs of exploitation are raised and acted on promptly.

- **Working time**

By setting clear limits on hours and ensuring proper rest, this policy helps prevent excessive working patterns that can be associated with exploitation.



Our policies to address human rights and modern slavery



We have an established governance process through our Health & Safety and Human Resources Policy Forum to consult on and implement employment policies. This includes consultation with our joint trade union forum (JTUF), which meets monthly. These policies are published on our intranet which is accessible to colleagues and agency workers.

This year, we have continued to review our policies, and the following have been updated:

- Holiday
- Maternity, paternity, shared parental and adoption leave
- Mobile devices
- Smoke-free workplace
- Travel, accommodation and expenses
- Special leave – family friendly
- Special leave – public duties

We will continue to review and update internal employment policies to ensure they meet all legislative and business requirements.

After completing a modern slavery supplier assessment with SFA, our agency worker provider was invited to speak at a Utilities Against Slavery webinar, highlighting the critical role of collaboration. Further details of the

collaboration work carried out between SFA and United Utilities can be found on our website:

[United Supply Chain – case studies](#)

Trade union relations

We develop effective partnerships with four main trade unions; Unison, GMB, Unite and Prospect. This enables effective consultation with our people on issues that affect them. There are three full-time representatives and a number of local workplace representatives, who are available within the company to provide colleagues with help and advice.

The unions also consult and negotiate with the company collectively on behalf of colleagues on key issues such as pay, terms and conditions and working practices. This is done through a number of monthly local forums covering the main areas of the business. Joint statements are published internally following each meeting.

Health, safety and wellbeing policy

United Utilities' vision is to be the best UK water and wastewater company. Acting with integrity and having an engaged, safe and healthy workforce is key to achieving this vision. We believe that nothing we do is worth getting hurt for, and that all our employees should

get home, safe and well. We will strive to eliminate work-related injuries and ill health whilst reducing risk and improving wellbeing by focusing on health and wellbeing. We will achieve this by focusing on eliminating hazards relating to health and wellbeing, personal safety and process safety.

We will continually review, improve and benchmark our health and safety management system to ensure that it provides a simple, effective control framework. We recognise that health, safety and wellbeing rely not just on having an effective system, but also on informed, competent and empowered people who make the right decisions at the right time and are therefore committed to regular consultation and participation of our employees and their representatives.

To achieve our belief, we will ensure that the six factors critical to success are a key part of our approach to health, safety and wellbeing.

These are:

- Active leadership
- Safe and healthy workplaces
- Simple effective systems
- Clear expectations
- Enabled, supported and engaged employees
- Continuous measurement, review and improvement

Our policies to address human rights and modern slavery



We will:

- Continue to make the management of health, safety and wellbeing a prime responsibility of everyone in the organisation
- Provide the right information, instruction and training at the right time
- Ensure that our working environments support healthy and safe practices
- Make roles, responsibilities and expectations clear to everyone
- Make health, safety and wellbeing personal
- Support people to make the right decisions
- Set and review objectives for those working for or on behalf of United Utilities

In addition, we will continue to review and improve how we manage health, safety and wellbeing through a planned programme of risk assessment and employee involvement at an organisational and business unit level. This will ensure that we strive to continually improve as a business and are compliant with legal and other requirements.

To help ensure we get everyone home safe and well, we have also introduced 12 life-saving rules focused on our key risks across the business. The 12 life-saving rules are not new rules but are designed to reinforce knowledge and understanding of the key risks affecting our business and the controls required to manage those risks safely. We have a bi-monthly focus feature (every other month) on each of the life saving rules. Getting home safe and well isn't simply a priority. It's who we are and what we do.

Our 12 life-saving rules reinforce the importance of speaking up, looking out for others and challenging unsafe behaviours, which in turn supports awareness of potential modern slavery risks across our operations and supply chains.

So how will we do this?

Working safely and looking out for ourselves, our colleagues and everyone else around us isn't new to United Utilities. But we want to remind everyone of what is expected of all colleagues when dealing with day-to-day activities and when we are facing difficult or time sensitive situations. The 12 life-saving rules are vital in making sure we all remain safe and get home well each and every day. Further information on our life-saving rules can be found in our Annual Report.





Modern slavery is one of the pertinent risks identified in our human rights risk assessment. Our policies and procedures seeking to mitigate the risk of modern slavery fall under our broader approach towards protecting human rights and upholding labour standards. We have identified three key areas of our business where there is the greatest risk of modern slavery and a likelihood that it can occur:

- **People working for us**
Through our recruitment and management of colleagues and engagement of agency workers, and contractors.
- **By association**
As a result of our operations, or as a secondary consequence of our actions.
- **Within our commercial arrangements**
Within our supply chain or through the use of products, or materials, which present a risk of potentially being produced under conditions of forced labour.

People working for us

We have been an accredited Real Living Wage (RLW) employer since 2021, with a commitment to make sure that all eligible colleagues working regularly directly or indirectly are paid at least the RLW rate determined by the Living Wage Foundation following regular reviews. This means colleagues earn a wage that goes above and beyond the legal minimum. This commitment extends to all in-scope contracted services within our supply chain, contingent workers and contractors. Further details on the RLW and the current rate can be found [here](#).

All new colleagues who join us directly, or who work on our behalf as agency workers, are subject to pre-employment checks to confirm their identity, right to work in the UK, and to verify employment history and qualifications. They are also subject to basic criminal record checks. In addition, for certain roles such as directorships and those with financial responsibilities, we carry out additional checks.

By association

As a UK utility company operating with a principal footprint in the North West of England, our use of stringent employment checks means that, in our assessment, we have materially mitigated the risk that modern slavery or human trafficking occur within the local area as a result of our operations, or as a secondary consequence of our actions.

Within our commercial arrangements

We have concentrated our efforts in ensuring our suppliers recognise their obligations under the legislation. We have continued working in partnership with the SFA to raise awareness through our Modern Slavery Awareness week activity which was showcased both internally to United Utilities colleagues and to the Supply Chain through our United Supply Chain approach. There is a strong central message on the importance of Modern Slavery awareness at our AMP8 partner events, attended by representatives from across our supply base. This reinforces our collaboration with external partners, such as the SFA, and ensures consistent messaging and alignment on Modern Slavery across the supply chain, as well as our approach to managing these risks.

We continue to mitigate modern slavery risks throughout the supply chain, and to ensure that our supplier selection, performance and management processes proactively seek to highlight any areas of concern. Within our contractual agreements, suppliers must comply with all applicable laws including the Modern Slavery Act 2015 and any breach of this clause could result in termination of contract.

Managing our supply chain



All United Utilities procurement activity is carried out by our Commercial department. Our approach is based on category management which takes a long-term view of our demand, specifications and the external supplier market to deliver the appropriate contract strategy. We build relationships with our key partners and suppliers based on common values to achieve our goals which are monitored through our Supplier Relationship Management (SRM) process.

United Supply Chain (USC) is our approach to working with our suppliers in a collaborative, proactive manner focusing on being 'better together'. Our approach is centred on ensuring that our responsible sourcing principles are brought to life and embedded throughout our supply chain. As part of this approach, we provide suppliers with resources and forums to share best practice to develop their own capability through our continued partnership with the Supply Chain Sustainability School. We have retained our gold level membership and aim to build a culture of best practice amongst our supply chain that we will continue to leverage going forward.

Activities to address modern slavery and human trafficking are incorporated into our [USC approach](#).

Our commercial processes ensure responsible sourcing principles are incorporated into contract pre-assessment, award process and ongoing relationship management.

At both sourcing and contract award stage, we undertake heat mapping exercises against all areas of the responsible sourcing principles as part of our Supplier risk assessment including modern slavery and human rights across our supply chain. As part of our ongoing supplier relationship management, supplier risk assessments are conducted annually following contract award and throughout the lifetime of the contract. These assessments form part of our commercial risk mitigation process and are carried out by Supplier Relationship Managers. Any identified risks are escalated to the responsible sourcing principles owners to ensure that appropriate mitigating actions are implemented. These risks are managed by the relevant Supplier Relationship Manager.

This enables an assessment of the issues through the supply chain allowing us to identify the key areas of impact and the control we may have.

Where there are risks identified, the process dictates that risk analysis is incorporated in the contract assessment and award process. Once we have a contract with a supplier, the issues of concern form the basis of action and improvement through ongoing supplier relationship management on an annual basis. For contracts where a high risk is identified, we undertake enhanced due diligence checks to provide assurance and mitigate risk.



Managing our supply chain



If a supplier is identified through our supplier risk assessment as having a limited understanding of modern slavery, we regard this as an opportunity to enhance capability within our supply chain. In such cases, the supplier is invited to join the modern slavery learning pathway offered through the Supply Chain Sustainability School. All United Utilities suppliers are granted free access to the School, which provides resources and training materials designed to support development across a range of subjects, including modern slavery, human rights, and fair treatment. As of this year, our modern slavery statement and human rights policy is included in the pathway to ensure suppliers have sight and awareness of United Utilities' specific policies.

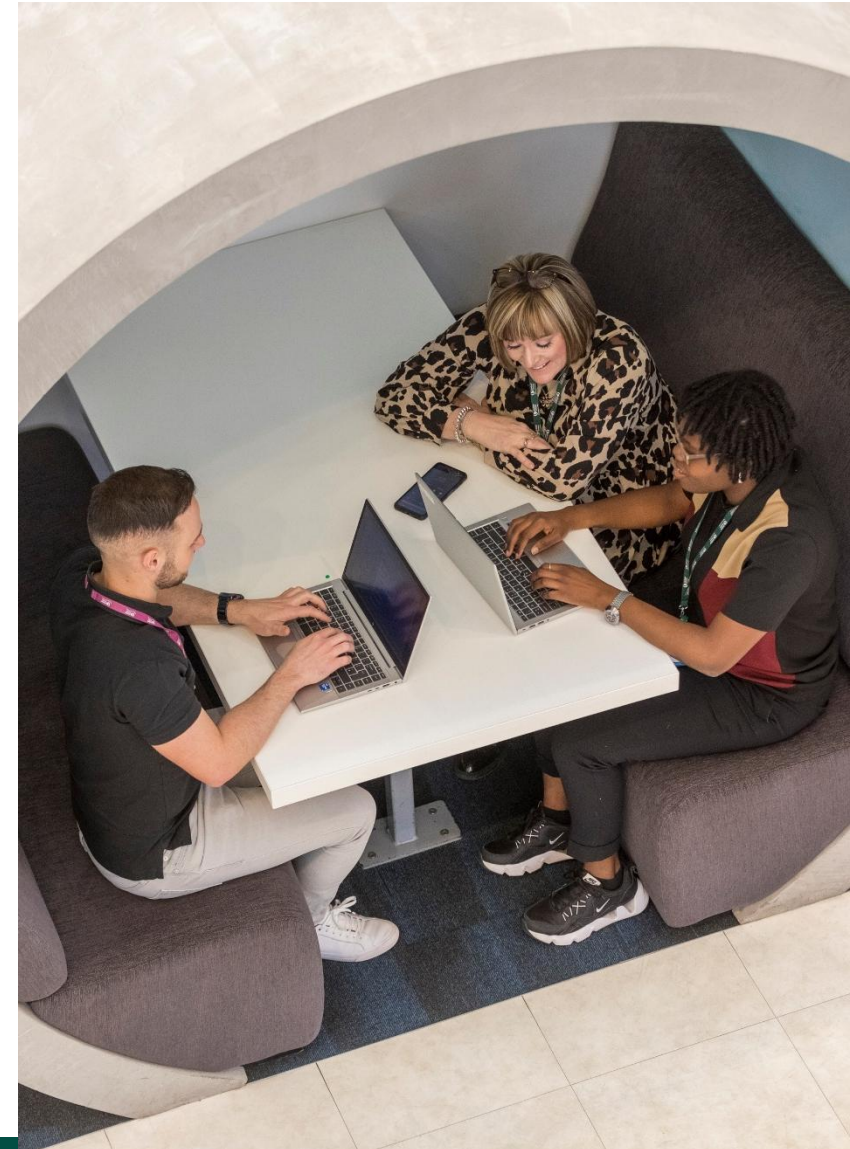
Our benchmark remains to ensure that all suppliers can demonstrate their employment and labour standards compliance, detailing their factories, people and ethical charters in each country where they operate. We also encourage the promotion of the United Nations Global Compact Principles covering human rights, labour standards, environment and anti-corruption, to ensure we are establishing a culture of integrity.

Responsible sourcing principles

Our responsible sourcing principles are structured around environmental, social and governance (ESG) issues that are important to us as a business and in our approach to responsible sourcing.

Considerations on modern slavery are incorporated into the wider issues of human rights and fair treatment, specifically: 'Treat people with dignity and respect, whilst working to eradicate modern slavery in all its forms'.

The principles are available on our website, and by 2030 we will have reached our AMP8 target of 95% of commercially-managed suppliers compliant with responsible sourcing principles. We are continuing to put measures in place to monitor ongoing supplier compliance to our responsible sourcing principles through our Supplier Relationship Management activities.





In June 2025, we undertook a comprehensive review of our procurement categories in partnership with Slave Free Alliance (SFA). This assessment examined known and emerging areas of potential modern slavery risk and established a detailed risk profile for each category. The review generated a series of key findings and recommendations, which have been implemented and evaluated over the course of the year to strengthen our approach.

This work has supported our internal risk mapping framework, and aligned our view of our six sensitive areas within our supply chain where the potential risk of modern slavery is greatest. These insights continue to inform our risk based due diligence activities and support our commitment to responsible and ethical supply chain management.

The following table details each of those sensitive areas and summarises the actions United Utilities has taken in the last year to mitigate identified risks.

Sensitive area	Annual spend	Market insights	Activity undertaken in financial year 2025/26
Construction and maintenance This function manages major infrastructure projects and is undergoing a significant expansion from AMP7 to AMP8, scaling from £1.5 billion to £6 billion in capital works. Delivery now involves a broader supply chain, expanding from a few Tier 1 contractors to dealing with over 60 contractors directly, including build-only suppliers. At a site level, this sector can feature complex labour supply chains, resulting in decreased visibility of recruitment practices; hence, strict subcontracting restrictions are necessary. The Maintenance procurement category within United Utilities is characterised by a structured yet responsive approach, balancing formal governance with the agility required for emergency situations. While sourcing is infrequent due to established supplier frameworks, there are occasional urgent needs for off-the-shelf items, where retrospective due diligence is applied.	£443m	Construction continues to feature as a common industry for forced labour globally, with the ILO estimating around 2.6 million victims working in this sector. This accounts for around 16% of all cases of forced labour globally. This sector was the third most reported industry in the UK according to Unseen in 2023, with 523 potential victims identified across 98 cases.	Our procurement activity has included scored questions in pre-qualification questionnaires about Human Rights and Fair Treatment, and our framework agreements include an anti-slavery contractual clause as standard. This year we have completed a number of audits of active construction sites across the North West to assess the awareness and communication on modern slavery. The audits included checking for site awareness and communication of modern slavery during induction and operation of the site. Auditors looked for signs of modern slavery throughout the audit. Also, a number of management system reviews of a selection of our construction contractors have been carried out which reviewed the contractors' policies and procedures in relation to Modern Slavery. In the coming year we will partner with Slave-Free Alliance (SFA) to conduct site assessments on a sample of our construction site



Sensitive area	Annual spend	Market insights	Activity undertaken in financial year 2025/26
Chemicals Modern slavery risks in the global chemical industry are real, though they're often less visible than in sectors like agriculture or textiles. Chemical production relies on complex, multi-tiered supply chains, heavy use of raw materials, and operations in regions where labour protections may be weak. All of this creates conditions where forced labour can hide. However, Utilities are heavily regulated and water-treatment chemical plants in most countries have strong safety controls, reducing fatality numbers.	£28m	There are no global statistics that isolate fatalities specifically within the water-treatment chemical sector. However, the sector sits within several high-risk categories – including chemical manufacturing, mining of raw materials, and hazardous substance handling – all of which have well-documented fatality rates. The ILO estimates 2.8 million work-related deaths annually, including around 1 million caused by exposure to hazardous substances. These upstream and adjacent risks are directly relevant to water-treatment chemical supply chains.	We have conducted further enhanced due diligence on our chemical framework suppliers, which included site visits to review working practices and conditions at suppliers' premises and to ensure expected standards are being met. Due to the nature of this category, there are common sector supply chain forums to tackle the risk across the water industry. Through existing collaborative water industry forums in the chemicals sector, we have continued to investigate opportunities to work holistically to tackle supply chain issues including modern slavery.
Workwear and personal protective equipment (PPE) To provide great water for a stronger, greener and healthier North West, we need the right tools and equipment to do our jobs, but we also need to keep ourselves and our people safe. The production of Personal Protective Equipment in certain geographical regions has been identified as a high-risk area for modern slavery, with hotspots in Xinjiang region and forced labour camps, concerns in Malaysia & Taiwan around sourcing PPE, and difficulties accessing sites in South-East Asia to conduct audits without lengthy notice.	£1.4m	Allegations of debt bondage, restriction of movement, and a lack of freedom of association are commonly associated with PPE manufacturing in China and Malaysia. As a result, many PPE suppliers are being required to evidence that they do not source from this location.	We have two framework agreements: one to provide all our PPE and workwear requirements, and the second framework to provide us with all our branded uniform needs. During monthly supplier meetings, a supplier risk matrix is reviewed, and changes are discussed between us and the supplier. This consists of ensuring our primary suppliers have submitted an ethical and anti-slavery statement. If there is a risk, it is categorised and followed by an evaluation of how the risk is to be addressed and then managed.



Sensitive area	Annual spend	Market insights	Activity undertaken in financial year 2025/26
Waste management We work with many suppliers for waste management across our operational sites who are all UK based. Waste and recycling have long been a complex industry with intricate supply chains, multiple service providers and jobs that attract 'low skilled', temporary workers.	£3.6m	The waste management sector in the UK has a large reliance on temporary labour agencies and migrant workers, particularly where manual sorting or picking is required. There are known high staff turnover rates which can create vulnerabilities for modern slavery and labour exploitation.	All our tenders for waste management requirements (inclusive of hazardous waste, chemical cleans, grits, screenings and general waste collections) have been tendered over the last 12 months. Within each tender, questions on modern slavery are included building on lessons learned from previous tenders and updated to adhere to the latest policy and market risks.
Information technology (IT) hardware and equipment and offshore labour Our technology category is vast and complex, encompassing a wide range of products, services, and infrastructure essential to the delivery of utilities. While much of the technology we procure comes from large, established vendors, the global nature of technology supply chain, particularly in the manufacturing of hardware, poses inherent risks related to modern slavery and labour exploitation	£233m	This industry is high risk due to its crossovers with various elements including raw material extraction, electronics manufacturing, and assembly. This includes activity undertaken in many different parts of the world. Material sourcing, including metals such as cobalt, lithium, and tin, as well as other rare earth minerals, has a high prevalence of child labour and forced labour. Manufacturing and assembly of hardware also pose their own modern slavery risks, including poor wages and unsafe working conditions.	In addition to modern slavery clauses in contractual requirements, risks are managed as part of our supplier relationship management approach with annual health checks carried out to ensure that the provisions are up to date, maintained and any improvements are captured and included.



Sensitive area	Annual spend	Market insights	Activity undertaken in financial year 2025/26
Network materials (such as pipes, fittings valves, etc), mechanical, electrical and maintenance goods and services The Networks category encompasses a diverse range of goods, works and services. Delivery often involves large managed service providers (MSPs) and a tiered supply chain, with some reliance on subcontractors, particularly for reactive maintenance and smaller-scale works. Framework agreements are in place to align suppliers with United Utilities' policies, but off-framework procurement and limited oversight of subcontractor practices remain key risk areas.	£394m	Workers in pipe and valve production facilities, particularly in India and China, may experience debt bondage due to excessive recruitment fees imposed by labour agencies. In addition to risks concerning workers, there are wider human rights considerations for the local communities where work takes place, including community displacement and environmental degradation.	In 2022, we completed a comprehensive risk assessment of our supplier base to establish the countries involved in our supply chain. We continue to refresh this exercise to help us identify and understand more about the location of our suppliers and consider whether we would use suppliers with close links to the conflicts. This is particularly prevalent in the network materials space – alongside chemicals, fuels, energy and information and communication technology (ICT). In support of this, we carry out supplier audits annually. Part of the remit of the supplier audits is to identify any possible risks within the supply chain. We ensure the audits are carried out at supplier premises as part of our due diligence, and our staff are trained on modern slavery risk indicators. As part of the audit, we also ensure our suppliers are adhering to our policies.



Training



We continue to embed modern slavery awareness across the organisation through a blended training approach. Our modern slavery e-learning module remains available to all colleagues, providing guidance on what modern slavery is, how to spot the signs, and the actions to take if concerns arise. We have begun working with the Slave Free Alliance (SFA) to enhance and update the module so that it reflects evolving best practice and remains engaging and relevant to colleagues in key roles.

This year, SFA delivered tailored briefings for our executive team and senior leaders across Commercial, Engineering, and Capital Delivery, as well as a procurement-focused workshop designed to build colleagues' understanding of how modern slavery risks could present in our supply chain. These sessions aimed to strengthen awareness of sector-specific risks and enhance confidence in identifying and responding to potential indicators.

SFA also delivered awareness raising sessions for a number of our colleagues during Anti-Slavery Awareness Week, supported by a range of broader engagement activities across the organisation, helping to reinforce the importance of vigilance in our communities and operations.

We held our all-partner event in April 2025, providing an opportunity to showcase our United Supply Chain responsible sourcing principles to all AMP8 partners, with 307 supplier companies from our supply chain attending. The event also supported greater awareness of modern slavery, with SFA and the Supply Chain Sustainability School (SCSS) hosting dedicated stalls to engage suppliers on best practice and available learning resources. SCSS promoted our learning pathways we have developed to support upskilling of suppliers through free access to the school, with 281 suppliers completing the modern slavery, human rights and fair treatment modules on SCSS throughout 2025/26.

In March 2026, we held our second all-partner event with attendance from over 600 supplier representatives. Suppliers were invited to engage directly with SFA to gain a further understanding of what the partnership has achieved over the past year, as well as our shared ambition to strengthen this collaboration further in 2026. Through these events, we continue to highlight the learning and development opportunities available to suppliers throughout AMP8 and beyond, reinforcing our commitment to capability building and long-term resilience across our supply chain.



Training



To address the risk of modern slavery from our supply chain and those of our suppliers, each year we aim to retain the Chartered Institute for Procurement and Supply (CIPS) Corporate Ethics Mark. This requires all relevant commercial colleagues to undertake additional online training covering human rights and forced labour in supply chains; the implications, the risks and how to respond. To complete the training, participants must reach the required pass mark.

We have retained the CIPS Corporate Ethics Mark and are undertaking the process to obtain it for the seventh consecutive year. This accreditation recognises the work we have done and the level of training we have provided to our staff in support of our aim of eliminating modern slavery and human trafficking.

Our colleagues work within communities across the North West every day, placing them in a prime position to recognise indicators of modern slavery. To support them in this role, we continue to focus on building awareness and ensuring they understand what to look for and how to respond appropriately if they encounter situations of potential concern.

Working with others

United Utilities is a proud member of Utilities Against Slavery (UAS). This group is facilitated by SFA and is a forum for energy, water and gas providers to collaborate to prevent and address modern slavery.

Through our membership of UAS we have developed training sessions, created a high-quality pre-qualification questionnaire to enhance due diligence practices, and a common approach to working with suppliers to support risk management.

The group signifies the importance of cooperation across the industry to drive up standards, identify risks, and create opportunities in relation to the human rights of persons employed in, or impacted by, business operations and their wider supply chains.

Raising awareness



Raising awareness of modern slavery remains central to our approach, and this year we delivered a wide range of activities designed to engage colleagues across the organisation in meaningful and accessible ways.

During Anti-Slavery Awareness Week, we created an interactive awareness hub in our head office, incorporating hands-on activities such as myth-busting tools, global statistic games and a mannequin display designed to help colleagues spot the signs of exploitation. These creative elements helped colleagues engage with a challenging topic in a way that felt approachable, relevant and thought provoking.

We complemented these activities with expert input from SFA, who delivered drop-in sessions and spent time in our social space speaking directly to colleagues answering questions and providing insights. We reinforced these activities with daily intranet articles, and externally, we published a LinkedIn post to raise awareness with colleagues, suppliers, and followers from across the water and construction sectors.

We were invited to speak at the SFA Annual Conference to share our approach to awareness raising, which provided an opportunity to showcase our progress, and help shape wider discussion on modern slavery awareness raising in practice.

Reporting of concerns



We take our responsibility to remain vigilant to the risk of modern slavery, both within our organisation and across our supply chain, very seriously. To support this commitment, we promote our whistleblowing policy and the confidential channels that colleagues, contractors, and suppliers can use to raise concerns safely and with confidence that appropriate action will be taken. These channels include the dedicated email address, whistleblowing@uuplc.co.uk, as well as an independent, confidential whistleblowing hotline and portal operated by our independent provider, Safecall.

The whistleblowing hotline and portal operates 24 hours a day, seven days a week (excluding Christmas Day) and is available to United Utilities colleagues, contractors, and suppliers. No whistleblowing cases relating to modern slavery or human trafficking have been flagged through this channel in the past 12 months, or at any time previously.

To date, we have not identified any cases of modern slavery or human rights abuses within our operations or supply chains, so we do not have a specific example of remediation to share. However, should such an issue ever arise, we are fully committed to taking swift and decisive action. Guided by the UN Principles on Business and Human Rights, we would ensure a victim-centred response – prioritising immediate and long-term support, access to relevant services, and fair compensation where appropriate.

Importantly, we would also review and strengthen our practices to help prevent similar issues from occurring in the future.

All matters which are reported to the hotline are treated in the strictest confidence by our independent provider, Safecall and are referred to United Utilities for investigation under the oversight of our Whistleblowing Committee. When a concern is raised, the details are recorded, an assessment is made regarding any further action required, and the appropriate senior personnel are notified so that a full investigation can be undertaken. Where possible, a confidential update on the outcome of the investigation is provided to the individual who raised the concern.

If someone is in immediate danger, dial 999

If you see something within UU, call the whistleblowing hotline: 0800 915 1571 (Safecall)

If you need help or advice, call the modern slavery helpline: 0800 0121 700

If you see something suspicious, download and anonymously report through the STOP app, to build the global picture of human trafficking

This year, we provided colleagues with additional guidance on the steps to take if they have concerns about modern slavery. As part of this, we held modern slavery awareness workshops to further engage staff and promote understanding of the signs to look out for. We continue to encourage colleagues to remain vigilant in the workplace and within the wider community and believe that knowing how to recognise and report potential indicators of modern slavery is a vital tool in helping to prevent and address it.

To ensure a consistent and effective response to a potential concern raised about modern slavery, including safeguarding of victims during potential incidents, this year, with support from SFA we have strengthened our escalation process. Over the next 12 months we'll be embedding the updated process across the organisation.



Continuous improvement



We are proud of our progress and achievements in relation to addressing the potential risk of modern slavery, however we recognise that further work will always be required, and it is important that we maintain our efforts. We understand that there is further to go within our organisation, within our supply chain and in collaboration with other organisations to raise awareness of and mitigate against the risk of modern slavery.

Ongoing activity

Over the next 12 months we plan to address actions including:

- **Training**

We will continue to strengthen and evolve our strategic training programme, working with SFA to further enhance our learning offering and ensure that colleagues in key positions receive tailored, high impact training aligned to any emerging risks and best practice.

- **Audits**

Over the coming year we plan to conduct a number of audits on our construction sites as well as a selection of management system reviews focusing on new contractors or those who have been identified as being high risk. We will continue working with SFA to further develop the requirements for our contractors.

- **Procurement activity**

To further embed our responsible sourcing principles within our procurement processes, we have worked with our external partner Supply Chain Sustainability School (SCSS) to create Pre-Qualification and Invitation to Tender questions specific to each principle. Question applicability will be identified following a supplier risk assessment undertaken as part of the strategy development. This is used as a mechanism to mitigate and manage modern slavery risks within the procurement processes, and the approach is continued into our supplier management strategy as specific supplier risk assessments are also undertaken when contracts are awarded and built into our supplier relationship activities to be reviewed on an annual basis.

- **Upskilling suppliers**

Throughout 2025/26, the SCSS continued to promote the learning pathways we developed to support supplier upskilling through their free-access platform. During this period, 281 suppliers completed modules on modern slavery, human rights and fair treatment via SCSS. In the year ahead, we aim to further increase engagement with SCSS by actively promoting the range of available learning resources through our quarterly USC newsletter. We plan to deliver a joint training session with SCSS, raising awareness of modern slavery and highlighting the support and resources available to suppliers and colleagues.



Continuous improvement



We acknowledge that our current strategy is focused on our supply chain with whom we have contracts for common goods and services. We also recognise the limitations that arise from global supply chains, and differences in legislation and culture across the globe. By understanding and being transparent about these challenges, we can begin to tackle them.

The risks associated with modern slavery are continually evolving. Global political and socio-economic factors, including ongoing conflicts such as those in Ukraine and the Middle East, continue to displace individuals and increase vulnerability to exploitation within labour markets. We continue to monitor these developments and assess their potential impact on our operations and supply chains. We engage on an ongoing basis with our suppliers and relevant external stakeholders, including anti-slavery organisations, to support the identification of heightened modern slavery risks and to inform our approach to prevention, mitigation and remediation.

This statement sets out the steps taken by United Utilities Group PLC and United Utilities Water Limited, both companies falling within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

It was approved by the boards of United Utilities Group PLC and United Utilities Water Limited on 12 May 2026 and signed by

Louise Beardmore
Chief Executive Officer
United Utilities Group PLC





unitedutilities.com/human-rights



Water for the North West