

# Anti-Slavery and Human Trafficking Statement 2025



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 a core part of how we create social value – 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, 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:
Target the remaining proportion of our colleagues operating within communities to complete the modern slavery awareness e-learning course, aiming for 100% completion rate.	Achieved 94% of our colleagues operating within communities completing the modern slavery awareness e-learning course.	Our colleagues who operate within roles that visit domestic and commercial properties to read meters or take samples and need to schedule time to complete training. We will continue to target the remaining proportion of our colleagues operating within communities to complete the modern slavery awareness e-learning course.
Commit to working with Slave-Free Alliance (SFA) to conduct a training needs analysis to create a strategic long-term training programme.	With support from SFA, created a strategic long-term training programme, which now includes facilitator-led training for colleagues within key roles across the business.	This year we will continue to execute our strategic training plan; this will include targeting colleagues in key positions with training tailored to their job role.
Review the auditors’ methodology and question set for social due diligence audits on our managed sites in 2023/24.	Engaged with SFA, who have completed an analysis of our current audit process. This included recommendations to further strengthen our methodology and due diligence process.  For the 2025/26 audit programme, we have developed a number of additional key questions with SFA which have been incorporated into the existing audit question sets for use on our construction sites.	Following these recommendations, we will arrange for SFA to conduct site assessment shadowing on several audits during 2025/26.



## 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 both prevent the possibility of exploitation within our supply chain and build our capability to respond to the risks.

We have continued with targeted modern slavery awareness training for colleagues in key roles, and whilst the focus on customer and community-facing roles remains, this year with support from SFA we have conducted a training needs analysis and created a strategic long-term training programme.

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. This year, we have completed modern slavery due diligence checks on 20 of our construction sites in addition to the review of the management system of one of our main construction partners.

We have retained our Corporate Ethics Mark from the Chartered Institute of Procurement and Supply (CIPS) for the fifth year, as a result of targeted training for our commercial colleagues. We aim to retain the CIPS Corporate Ethics Mark again in 2025–2026 to ensure our commercial colleagues are equipped to meet the challenges of modern slavery and human trafficking.

While we reflect on some positive progress this year, we are committed to addressing the global issue of modern slavery, and ensuring that internally, 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 businesses in the North West of England. The group's principal subsidiary, United Utilities Water Limited (UUW) operates solely in the UK.

We directly employ over 6,600 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 550 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 2024 to 31 March 2025, during which our revenue was £2.145 billion.

## Oversight of human rights and modern slavery governance

Our Chief Executive Officer has overall responsibility for compliance with human rights and modern slavery laws and 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, and comprises representatives from Legal, People, Commercial, Corporate Affairs, Audit, Assurance, Health & Safety, Technology Services and Customer. To ensure we are tackling issues holistically, our approach is aligned to our purpose, values and corporate policies. This year the group has continued to review and assess any potential risk areas impacting colleagues, suppliers, customers and communities.

Over the coming year, the group will be working with Slave-Free Alliance (SFA) on our audit practices and implementing any further recommendations from the SFA Gap Analysis.



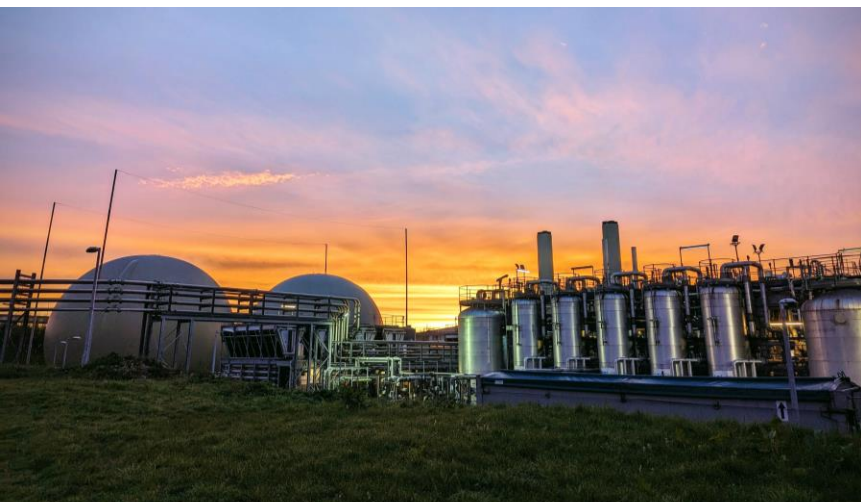
# Our supply chain



In the last financial year United Utilities has spent around £1.7 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 2025, the figure was 99% 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.

Other performance indicators include:

- Percentage of strategic suppliers that have a sustainability risk assessment in place 94% against target of 75%
- Supplier Relationship Management annual reporting score 94% against our target of 90%
- Percentage of targeted suppliers signed up to United Supply Chain 100% against our target of 100%

Up-to-date sustainability risk assessments and annual reporting scores for our strategic suppliers enable our teams to apply targeted risk management strategies to our supply chain to identify and mitigate risks in a proportionate and relevant manner. We also closely monitor the adoption of our United Supply Chain responsible sourcing principles by our targeted suppliers, to create a high-quality supply chain and provide suppliers with a way of enhancing their performance in the North West and beyond.

# 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
- Equality and diversity
- Esteem in the workplace
- Family friendly and special leave
- Grievance
- Health, safety and wellbeing
- Maternity, paternity, shared parental and adoption leave
- Mental wellbeing
- Safeguarding and prevent
- Social and interactive media
- Whistleblowing
- Working time

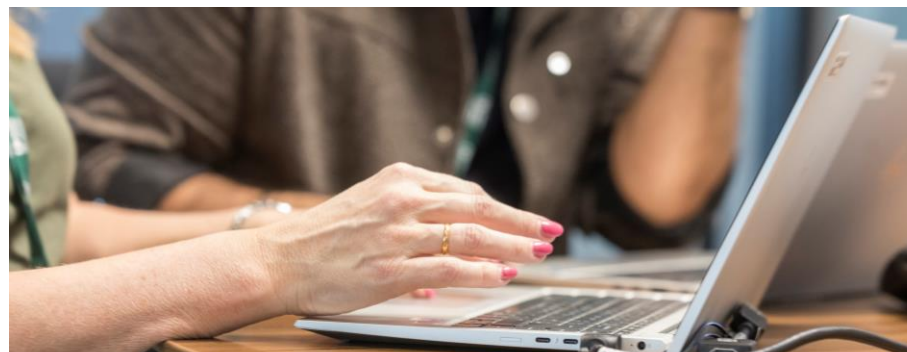
We have an established governance process through our Health & Safety and Human Resources Policy Forum to consult on and implement employment policies. This includes consultation with our joint trade union forum (JTUF), which meets monthly. These policies are published on our intranet which is accessible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

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

- Whistleblowing
- Esteem in the workplace
- Family friendly and special leave
- Flexible working
- Maternity, paternity, shared parental and adoption leave
- Mobile devices
- Social and interactive media
- Secondments
- Travel, accommodation and expenses
- Employee data protection

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

During 2023, an agency worker tender was completed, and a new provider was appointed. This year the provider has collaborated with Slave-Free Alliance to complete a supplier assessment regarding efforts to address modern slavery.



## 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.





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 our 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. Read more about the **RLW and the current rate**.

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 are working in partnership with the Slave-Free Alliance to raise awareness and 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.



# Managing our supply chain



All United Utilities Group 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 work 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.

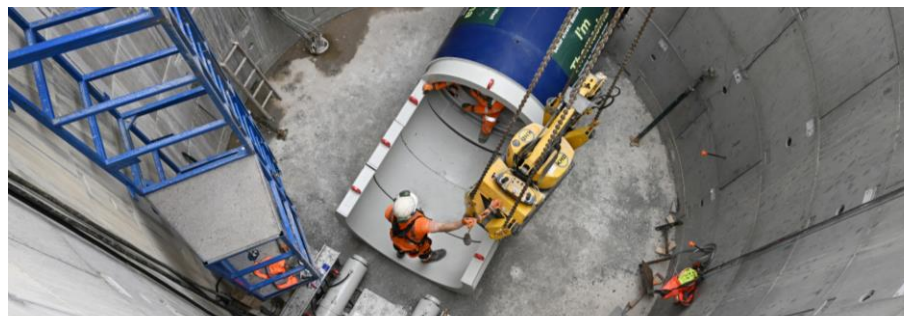
Activities to address modern slavery and human trafficking are incorporated into our **USC approach**.

Our commercial processes ensure responsible sourcing principles are incorporated into contract pre-assessment, award process and ongoing relationship management. At a procurement category level, we undertake heat mapping exercises against all areas of the responsible sourcing principles as part of the sustainability risk assessment, including modern slavery and human rights across our supply chain.

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. Currently over 94% of our strategic suppliers have a sustainability risk assessment in place.

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. For contracts where a high risk is identified, we undertake enhanced due diligence checks to provide assurance and mitigate risk. We have achieved our target to undertake enhanced due diligence on 5% of high-risk categories by 2025, and we are working to set ourselves a challenging target for the next period.

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.

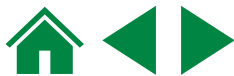


## Responsible sourcing principles

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 to all on our website, and we have achieved our commitment that 100% of targeted suppliers would be signed up to the principles by 2025. We are putting measures in place to monitor ongoing supplier compliance to our responsible sourcing principles through our supplier relationship management activities.

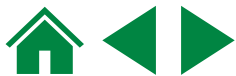


Through our internal risk mapping process, we have identified six sensitive areas of our supply chain where there is the greatest potential risk of modern slavery.

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 (£)/percentage of overall spend	Market insights	Activity undertaken in financial year 2024/25
<b>Construction and maintenance</b> Approximately 75% of our construction work has been undertaken by two delivery partners with whom we have been working on a partner basis. The ramp-up of activity over the next five years will see our supplier base in this space increase to approximately 70 construction suppliers, which has the potential to multiply the risk of modern slavery through our supply chain. Many of these construction partners employ sub-contractors and, as the supply chain reaches further from our business, there is less visibility and control over employment practices.	£322 million/21%	Construction continues to feature as a common industry for forced labour, with the ILO estimating around 2.6 million victims working in this sector. This equates to 16% of all cases globally. There are various reasons as to why this industry is vulnerable to forced labour, including complex labour supply chains which result in decreased visibility of employment practices.	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 20 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. Modern slavery considerations have also been incorporated within existing health and safety audits on our network partners. In the coming year we will arrange for Slavery Free Alliance to conduct site assessment shadowing on a number of audits.
<b>Chemicals</b> Our chemical category is ever emerging as a risk area, not only on the issue of modern slavery, but also for other environmental risks. The chemical industry presents a higher risk for victims of modern slavery due to the significant vulnerabilities faced by its workers. Vulnerabilities in the chemical sector are related to exploitation in high-risk countries, and chemical exposure.	£64.6 million/3.8%	Figures show that worldwide, over 2.78 million workers in this sector die annually due to poor working conditions (ILO). Nearly 1 million worker deaths each year are caused by exposure to hazardous substances. At least one worker dies every 30 seconds from occupational chemical exposure (UN, 2018).	<p>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. We will continue to complete site visits including enhanced due diligence over the next 12 months.</p> <p>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.</p>





Sensitive area	Annual spend (£)/percentage of overall spend	Market insights	Activity undertaken in financial year 2024/25
<p><b>Workwear and personal protective equipment (PPE)</b></p> <p>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 and Taiwan around sourcing PPE, and difficulties accessing sites in South-East Asia to conduct audits without lengthy notice.</p>	£1.15 million/0.6%	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.	<p>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.</p> <p>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.</p>
<p><b>Waste management</b></p> <p>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.</p>	£3.1 million/0.19%	The waste management sector in the UK has a large reliance on temporary labour agencies and migrant workers, more recently from North-Eastern Africa, 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.	<p>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.</p> <p>These include questions on modern slavery utilising lessons learnt in previous tenders with modern slavery policy update targets built into the contractual management information and KPI requirements.</p>

## Supply chain modern slavery risk assessment



Sensitive area	Annual spend (£)/percentage of overall spend	Market insights	Activity undertaken in financial year 2024/25
<p><b>Information technology (IT) hardware and equipment and offshore labour</b></p> <p>IT equipment remains a focus due to the large proportion of manufacturing taking place in South-East Asia, where we continue to work with our established framework partners to ensure appropriate relationships and controls are in place with the wider supply chains in this region.</p>	£41 million/2.4%	<p>This industry is high risk due to its crossovers with many elements including raw material extraction, electronics manufacturing, and assembly. This includes activity undertaken in many different parts of the world.</p> <p>Manufacturing and assembly of hardware also pose their own modern slavery risks, including poor wages and unsafe working conditions.</p>	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.
<p><b>Network materials (such as pipes, fittings valves, etc), mechanical, electrical and maintenance goods and services</b></p> <p>The materials used in manufacturing pipes, mechanical and electrical components, which can include steel, copper and aluminium, present a high risk of modern slavery due to raw material extraction and manufacturing processes. Mining risks can include forced labour and child labour, or the use of conflict minerals such as tin, tungsten, tantalum and gold.</p>	£504 million/29.6%	<p>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.</p> <p>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.</p>	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).



We have a modern slavery awareness e-learning course which covers what modern slavery is, the Modern Slavery Act, how to spot the signs and what to do if you have concerns. The course is available to all our colleagues on our online education platform.

This year, with support from Slave-Free Alliance (SFA) we have developed a strategic training plan. Whilst a focus remains on our colleagues who are operating within communities or directly involved in commercial activities, our long-term plan also includes targeting colleagues in key positions with training tailored to their job role.

This year, SFA has delivered modern slavery awareness training to a number of colleagues in key roles, including members of our Audit and Assurance team, increasing awareness of what modern slavery might look like in our industry.

We have also invited all our suppliers participating in AMP8 to an all-partner event in April 2025, with representation from SFA and Supply Chain Sustainability School, to promote and encourage further upskilling of our strategic suppliers in the areas of sustainability and modern slavery.



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 sixth 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 people are operating within the communities of the North West on a daily basis. To play our part in addressing modern slavery we want to support them so they know what to look for, and how to respond, if they encounter situations where modern slavery may be occurring in the community.

## Working with others

Our business 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

Throughout 2024 we participated in events and workshops to raise awareness of modern slavery and promote discussion on how to minimise the potential risks in our operations.

We held a workshop alongside the Slave-Free Alliance (SFA) to refresh colleagues’ knowledge and agree on the actions we needed to take. Colleagues from our Sustainability team also hosted a table at the SFA conference in November 2024, playing our role to help other organisations understand more about protecting against the risk of modern slavery and labour exploitation.

Every October, we participate in a Modern Slavery Awareness Week to coincide with UK Anti-Slavery Day. During the week we publish daily communications to engage and remind our colleagues about modern slavery, share the latest statistics, and give updates on what we’ve been doing since our last modern slavery statement.

During our 2024 Modern Slavery Awareness Week we used a number of communications channels, including the intranet, campaign stands, and TV screens to give colleagues information on:

- How to spot the signs of modern slavery
- Modern slavery in the news
- Anti-Slavery Day
- The United Utilities Modern Slavery and Human Rights Working Group
- Our work with SFA
- Keeping modern slavery out of our supply chain
- E-learning opportunities

Externally, we published a LinkedIn post on Anti-Slavery Day to raise awareness with colleagues, suppliers, and followers from across the water and construction sectors.

# Reporting of concerns



We take very seriously our responsibility to remain alert to the potential for modern slavery issues both internally and within our supply chain. To maintain our vigilance, we promote our whistleblowing policy and the independent, confidential whistleblowing hotline (Safecall) to our colleagues, so that concerns may be reported safely and ensure that appropriate action is taken to deal with any identified issues.

The whistleblowing hotline is available 24 hours a day, 7 days a week (excluding Christmas Day) to United Utilities colleagues, contractors, and suppliers. No issues related to modern slavery or human trafficking have been reported to the whistleblowing hotline during the last 12 months, nor previously.



This year, we have communicated further information to our colleagues on the steps to take if they are concerned about modern slavery. We have encouraged colleagues to be vigilant in spotting the signs of modern slavery within the community and whilst at work. We believe that knowing how to spot the signs and report them is a key tool in addressing modern slavery.

All issues reported to the hotline are handled in the strictest confidence by an independent operator, Safecall. When a concern is raised via the above means, the basis of that concern will be recorded, a decision made on what further actions are required and the relevant senior personnel informed so that a full investigation can be carried out. An update on the outcome of the investigation will be provided confidentially where possible to anyone who reports a concern.

To ensure a consistent and effective response to a potential concern raised about modern slavery, including safeguarding of victims during potential incidents, over the next year we will develop our escalation process for potential incidents.



# Continuous improvement



We are proud of both 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**  
This year we will continue to execute our strategic training plan; this will include targeting colleagues in key positions with training tailored to their job roles.
- **Audits**  
Over the coming year we have 37 audits of our construction sites planned. In addition to these site audits, we have programmed management system reviews, which include how modern slavery risks are controlled across the portfolio of projects, on 8 of our construction partners. We will continue working with Slave-Free Alliance (SFA) to upskill our auditors in conducting modern-slavery focused site assessments.

- **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 Sustainability 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 is then continued into our supplier management strategy as specific sustainability risk assessments are also undertaken when contracts are awarded and built into our supplier relationship activities.

- **Upskilling suppliers**  
We are holding an all-partner event in April 2025, which will showcase our United Supply Chain responsible sourcing principles to all our AMP8 partners and educate on areas of modern slavery through SFA and SCSS, who will be hosting stalls.

We acknowledge that our current strategy is focused on our tier one 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.

We understand that the risks associated with modern slavery are constantly evolving. The changes in the labour market as a result of global, political and socio-economic factors, such as the ongoing conflicts in Ukraine and the Middle East, are increasing the risk of exploitation as greater numbers of individuals are displaced. We will continue to engage closely with our supply chain, and anti-slavery groups, in relation to identification of increased modern slavery risk.

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 13 May 2025 and signed by

**Louise Beardmore**  
**Chief Executive Officer**  
United Utilities Group PLC



[unitedutilities.com/human-rights](https://unitedutilities.com/human-rights)



Water for the North West