

Slavery and Human Trafficking Statement - 2018

It's part of our Blueprint



KeldaGroup



This statement focusses specifically on Kelda Group and Kelda Eurobond's compliance with the Modern Slavery Act 2015 (the Act) and highlights the steps we take to assure there is no slavery or human trafficking occurring within the organisation or its supply chains.

Kelda provides water and sewerage services to domestic and business customers across the UK and employs more than 3,200 people. Kelda Group is a holding company for the following subsidiaries:

- **Yorkshire Water Services Limited** (Yorkshire Water) - provides water and sewerage services to around 5 million people and 140,000 businesses in the Yorkshire region.
- **Kelda Water Services Limited (KWS)** – operates water and waste water contracts across the UK.
- **Three Sixty Water Limited** – offers water and waste water retail and added value services to non-household customers across the UK.
- **KeyLand Developments Limited (KeyLand)** – manages the Group's surplus property assets, either on its own or in partnership with outside organisations.
- **Loop Customer Management Limited (Loop)** – delivers customer service support to Yorkshire Water that includes billing, debt recovery and incident management.
- **Kelda Transport Management Limited** – provides operating licence compliance and promotes safe and efficient practices for Yorkshire Water's fleet of Large Goods Vehicles.

Kelda's organisational structure and Group relationships are summarised [here](#).

The [Kelda Group Human Rights Policy](#) recognises international human rights as set out in the Bill of Human Rights, and the principles described in the UN Global Compact.

Risks to the Kelda Group associated with the Act are managed in accordance with the [Kelda Group Risk Management Policy](#). Specific materiality assessment is carried out across the supply chain by individual Procurement teams as required.

Kelda operates solely within the UK and how we employ and treat our employees is managed consistently across the Group by the Human Resources (HR) Directorate. As demonstrated by our Living Wage accreditation, we ensure all direct employees are paid a wage that is over and above the statutory wage levels set by the UK Government. A Living Wage clause is also included in supplier contracts to ensure qualifying contractors also receive at least the Living Wage, including where working for a subcontractor. Any breach of these clauses can lead to termination of the contract. Accreditation is externally assured by the Living Wage Foundation.

Kelda's HR team have reviewed HR policies and procedures in light of the Act. We have developed an employee guideline document on human trafficking, modern slavery and forced marriage to ensure our colleagues have access to the information and support they require. We expect our employees to fully observe and adhere to these policies and procedures.

Kelda Group supplier contract templates do not ordinarily mention and request compliance with individual Acts. Due to the nature and extent of such laws, we do not mention them all specifically in our templates. These matters are covered by an Applicable Law definition and associated wording which we include in all contracts.

Applicable Law means:

- i) *any statute or regulations or other law, regulation or by-law or any rule, code, judgment, decision or direction having the force of law; and*
- ii) *any regulation, rule, code, direction, determination, guidance or other document which does not have the force of law but which a supplier of the Goods (acting in accordance with all of its obligations in this Agreement) would comply with as a matter of customary good practice, of England and Wales or any relevant part thereof, or of the European Union (to the extent relevant and applicable) or any public body, authority, local or national agency, department, inspectorate, ministry, official or public or statutory person (whether autonomous or not) which has appropriate jurisdiction.*

In addition, Kelda Group has continued meeting its supply chain commitments on slavery and human trafficking by continuing with the following steps during the 2017/18 financial year:

- Initiated a supplier communication and contract amendment exercise as a result of the risk assessment carried out by the Wilberforce Institute of Slavery and Emancipation (WISE) at the University of Hull.
- Published the Kelda Group Sustainable Procurement Strategy and emphasised the importance of the act through several supplier engagement days.
- Maintained awareness across the Procurement & Contract Management function via individual procurement risk assessments and enhanced contractual obligations.
- We have included Modern Slavery specific pass/fail criteria for all Procurement led tender processes and new vendor requests.

We support the aims of the Act and remain committed to ensuring the eradication of modern slavery and human trafficking. We will continue to drive improvement on these matters throughout our business and supply chains.



Richard Flint, Chief Executive

(Statement approved by Kelda Holdings Board 30th January 2019)

