



## Wave Modern Slavery and Human Trafficking Statement

### Introduction

This statement highlights the steps that we have taken to ensure that slavery and human trafficking is not taking place in any part of our business or within our supply chain.

We are a leading national utilities retailer, supplying more than 300,000 business customers across the UK. We employ approximately 360 people. Wave is a joint venture between Anglian Water Venture Holdings Limited and Northumbrian Water Group Limited. Wave is the trading name of Anglian Water Business (National) Limited. To find out more about the nature of our business please click <https://www.wave-utilities.co.uk/> We consider that our business activities are low risk in relation to modern slavery and human trafficking.

### Statement of Commitment

We have a zero tolerance approach to any form of slavery or human trafficking, either within our business or our supply chain, and we are committed to doing all we can to prevent slavery or human trafficking within our business or within our supply chains.

### Procurement

We have detailed procurement processes, which require all suppliers to demonstrate that they provide safe working conditions, treat workers with dignity and respect, act ethically and comply with all applicable legal requirements. Our supply chain includes the provision of goods and services that support customer billing, customer services, meter reading, logger provision, fixing of leaks, water efficiency, the purchase of wholesale water and sewerage services and IT provision. We have risk assessed our entire supply chain and consider our business activities to be low risk because we operate solely in the UK and the vast majority of our suppliers are UK based (with the exception of two who are based in the USA and New Zealand respectively).

Our agreements contain provisions requiring suppliers to comply with applicable laws and entitle us to conduct audits to assess the extent of legal compliance. When contracting with suppliers on our own terms and conditions, we require our suppliers to ensure they have in place appropriate measures to minimise the risk of modern slavery and human trafficking within their business.

We have a process of undertaking due diligence when appointing new suppliers, which includes written confirmation that measures are in place to prevent modern slavery or human trafficking, and we have reviewed our existing suppliers to confirm that they satisfy our requirements with respect to the Modern Slavery Act.

### People

We carry out checks on all directly employed staff and issue a written contract of employment. Information is provided to all new employees on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

We also use recruitment agencies to recruit both temporary and permanent employees. We thoroughly check recruitment agencies to ensure they comply with all legal requirements before adding them to our list of approved agencies.

Our Whistleblowing Policy and general employee communications encourage employees to identify and report any suspicions with regard to malpractice, illegal or underhand practices in the workplace. We have a confidential reporting system for matters such as these.



We raise awareness amongst our staff through our Business Ethics Policy and Code of Conduct which is published on our intranet and sets out our expectations for high standards of behaviour.

#### Other Relevant Wave Policies

We have in place the following policies which are relevant in the identification of modern slavery risks and which link in to our commitment to prevent modern slavery and human trafficking:

- Recruitment and Selection
- Anti-Bribery
- Procurement

Any known or suspected incidence of modern slavery or human trafficking, either within our business or supply chain will be investigated on a case by case basis and appropriate action taken.

#### Further steps planned:

- To develop KPIs to measure how effective we have been in combatting slavery and human trafficking.
- To raise the profile of Human Slavery within Wave through promoting a separate Modern Slavery Policy published on our intranet.
- To enhance our training provision across the business to raise awareness and provide more detailed training for those involved in procurement, compliance and recruitment.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Wave's anti-slavery and human trafficking statement for the financial year ending 31 March 2019. It has been approved by the organisation's board of directors.

Chief Executive Officer's signature:

A handwritten signature in black ink, appearing to read "Lucy Darch".

Chief Executive Officer's name: Lucy Darch

Date: 15 July 2019