



BRISTOL
WATER

Modern Slavery Statement

Pursuant to section 54 of the Modern Slavery Act 2015

April 2021



This statement is made by Bristol Water Group Limited (07671099) and its wholly owned subsidiaries, including:

Bristol Water Holdings UK Limited (04789566)
Bristol Water Holdings Limited (02630760)
Bristol Water Core Holdings Limited (04637554)
and Bristol Water plc (02662226)

References to 'we', 'our', and 'Bristol Water' refer to all these companies.



About Bristol Water

Bristol Water was founded in 1846 by people who were passionate about the wellbeing of society and serving our community. This is manifested in our culture and values. We expect to be accountable for our contribution to social wellbeing and this is an essential element of our corporate governance.

We are a water supply company operating in the Bristol and West of England region. Our supply area extends from Tetbury in the north, to Glastonbury and Street in the south, and from Weston-super-Mare in the west to Frome in the east. We serve a population of **1.2 million people** in an area of **2,400 km²** (1,000 miles²).

In addition to our water supply business, we also have a fisheries and recreations team operating at Chew Valley Lake and Blagdon Lake.

We employ around **600 people** and rely on many suppliers to help deliver our services. Most of our operations and activities are year-round and we rarely engage seasonal employees, contractors, or suppliers.

As a regulated business that provides an essential service, we understand the higher standards expected of us by the public in relation to our business ethics, conduct, and corporate compliance. For this reason we aim to go beyond the requirements of the Modern Slavery Act 2015, to actively promote the issues, and join initiatives to tackle modern slavery in our supply chains and in our communities.

Our Values

We believe in being and are empowered to be:

- **Proud** of our part in the community and serving our customers;
- **Respectful** of each other's wellbeing. We are inclusive and do not tolerate disrespectful behaviour;
- **Supportive** of each other to build a strong team;
- **Accountable** for our actions and consequences;
- **Professional** in our work and operate transparently;
- **Ambitious** to be more than a small water company, we will always challenge ourselves to be and do better; and
- **Trustworthy** to conduct our business with the highest integrity.



SUPPLY CHAINS

All tenders that are processed on the Achilles procurement system have to answer Pre-Qualification Questionnaires (PQQ), including those that specifically relate to modern slavery.

In the last 12 months we brought a number of roles in-house that were previously contracted out, including facilities maintenance and meter installation. One of the benefits is that we now directly employ people for roles that would otherwise have been one of our highest risk factors.

In 2020-21 we set an ambition to implement a five-year plan for due diligence assessments. Because of resource issues we were not able to prioritise this activity.

For 2021-22 we aim to:

- Review our PQQ and work with the wider utilities industry to create an industry standard, which will be simpler and easier for suppliers to complete.
- Create a mid-contract audit scheme and pilot it with at least 3 of our higher-risk suppliers.

POLICIES

This statement is supported by a range of policies and procedures that are all aimed to ensure we operate responsibly and ethically in all aspects of our business, including:

- Business Conduct and Ethics Policy
- Human Resources Corporate Policy Statement
- Recruitment, Selection, & Appointment Policy (updated 2019)
- Procurement Policy (updated 2019)
- Anti-Fraud, Bribery and Corruption Policy
- Whistleblowing Procedure

All policies are approved by the Executive Management Team or Bristol Water plc's Board.

Over the last year we have focused on corporate governance and document management. As a result the company is reviewing existing documentation



and creating new policies and procedures where there were not previously. The Board is taking an active role in this project and now approve all company policies, including those listed above.

RISK ASSESSMENT

The risk assessment (using a methodology developed by the Social Responsibility Alliance) completed last year was reviewed before publishing this Statement. There has been no material change and therefore the risk remains the same:

Inherent Risk Score: 10/25 (medium)

Risk Control Score: 36.5/100 (medium)

The risk assessment is a series of yes/no questions and each response generates a score. The weighting of the response has been tailored to Bristol Water's risk appetite.

To lower the Risk Control Score we need to improve our supplier due diligence assessments and explicitly refer to modern slavery in our policies.

PEOPLE

Where possible we try to limit the use of temporary workers and hire permanent members of staff. Less than 3% of our hires come from recruitment companies. We only use well established and reputable agencies from our list of preferred suppliers. All agencies have signed up to our terms and conditions, which includes a commitment to uphold the laws of England and Wales.

Bristol Water pays a living wage to all our employees. Where agency workers are used they will receive favourable pay comparable to a full-time equivalent for the entirety of their employment.

EFFECTIVE ACTION

There were 0 instances of modern slavery reported on whistleblowing procedure. This procedure has been revised and updated to increase confidence in the security and confidentiality of the process and will also be opened up to all suppliers and contractors.

Our standard terms and conditions contain a modern slavery clause and all suppliers and contractors are asked to confirm their compliance with the Modern Slavery Act both during the Invitation to Tender (ITT) and as a



condition to their contract.

Bristol Water is a member of the Utilities Sector Modern Slavery Group, in partnership with the Slave-Free Alliance. The aim of the group is to reduce the risk of modern slavery in the utilities sector by working in partnership on challenges, sharing best practice, raising awareness, and cross-sector initiatives. In particular the Group is looking at:

- Creating a standard set of PQQs for the utilities industry (this activity is being done with the support of Achilles)
- Reviewing PPE suppliers and conducting due diligence audits with these suppliers
- Promoting education among employees (this activity is being done with the support of the Sustainability School)

TRAINING

In the last 12 months the procurement team have attended training on modern slavery due diligence, delivered by the Sustainability School.

In the next year we will be looking at further opportunities of training and awareness, in particular using resources delivered by the Sustainability School and United Utilities.

All new starters receive training on our Whistleblowing Procedures. Posters advertising this procedure are displayed at all our major sites.



Steps Taken in 20/21	Further Actions for 21/22
Reviewed the 2020 risk assessment to see if there has been any change in the risk score.	Continue to review and identify opportunities for improvement. Review if there are other matrices that may help deepen our understanding of risk and priorities.
Created a programme for reviewing and updating policies and procedures.	Review and update all policies in the Legal Affairs department, including Anti-Bribery and Corruption.
Implemented new whistleblowing procedure for employees.	Continue rollout of whistleblowing procedure and make it available to suppliers and contractors
Work with the Utilities Sector Modern Slavery Group and the Slave Free Alliance.	Explore further opportunities to tackle modern slavery across the utilities sector.
Procurement team attended training on due diligence with a particular focus on relevance to the Utilities Sector.	Look at further training and awareness resources available through the Sustainability School and other providers.
	Review our due diligence procedures in relation to PQQ and mid term audits, including piloting the audit with at least 3 suppliers.

This policy is approved by Bristol Water plc’s Board of Directors. Responsibility for compliance with this statement is company-wide and the Legal Affairs team monitor compliance.

This statement has been created with input from the Legal Affairs team, Procurement, and HR.

This statement was approved by the Board of Bristol Water Group Limited on 25 March 2021

Paul Malan
Director - Bristol Water Group Limited