2025 ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT



SEVERN TRENT

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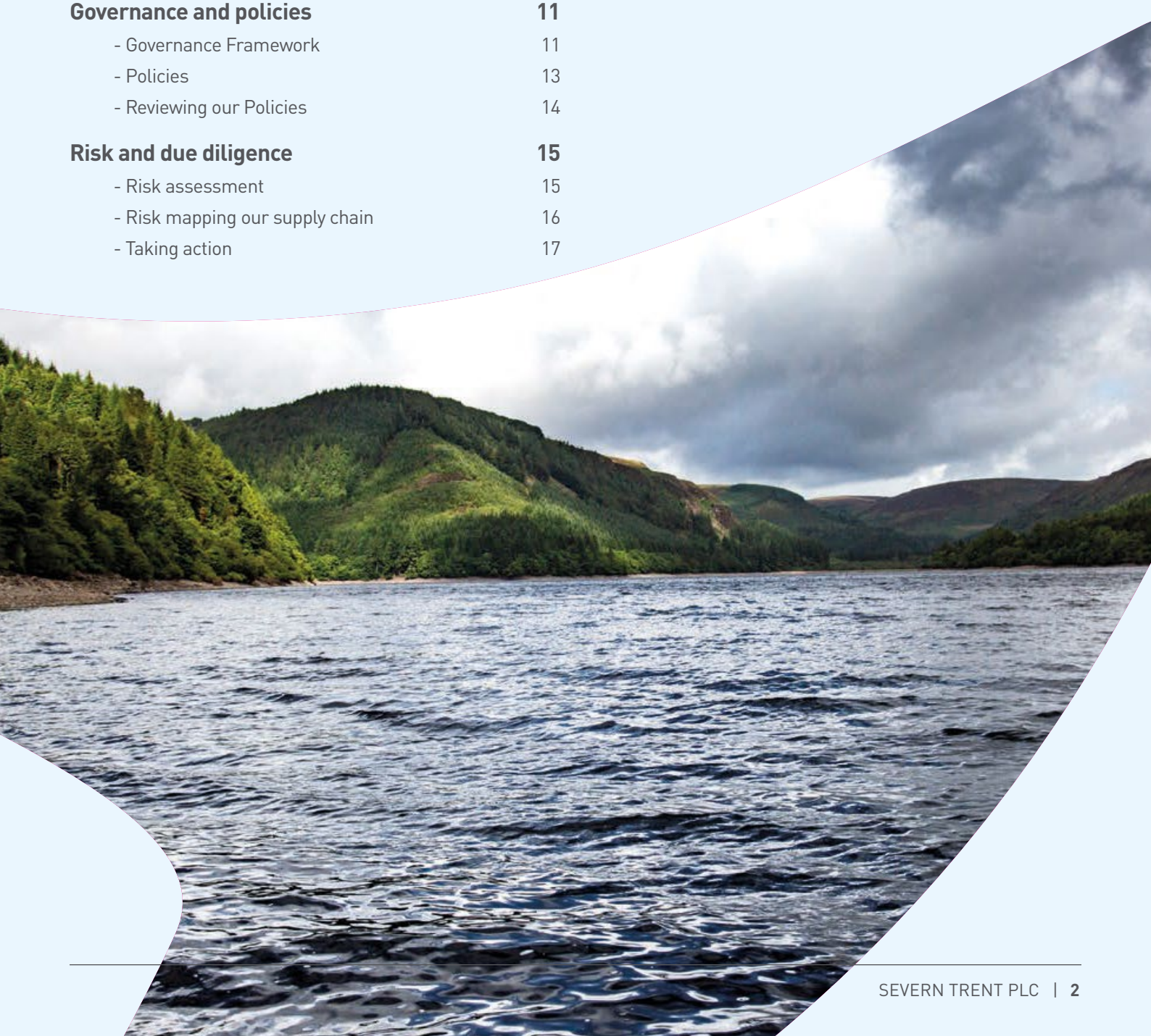
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OUR COMMITMENT

At Severn Trent, our purpose—taking care of one of life's essentials for the long term—guides everything we do. It's a purpose that extends beyond water and wastewater services, encompassing our commitment to people, planet, and doing the right thing. This includes our unwavering stance against modern slavery in all its forms.

Ten years on from the introduction of the Modern Slavery Act (2015), the landscape in which businesses operate has become increasingly complex. While progress has been made, the issue remains deeply embedded and often unseen. That's why we remain resolute in our efforts to eliminate the risk of modern slavery from our operations and supply chain.

We recognise that the operational context for our own industry continues to change and as we head into our next Asset Management Period ('AMP'), the demands placed on both our growing workforce and that of our supply chain will increase. Under this context we remain resolute in addressing this often 'unseen' issue within society.

Our Anti-Slavery and Human Trafficking Statement outlines our approach, the progress we've made, and the steps we're taking to continuously improve.

Partnerships play a pivotal role in our ability to progress on our approach. Collaborating with trusted partners such as Slave-Free Alliance, Utilities Against Slavery, and the Supply Chain Sustainability School enables us to stay ahead of emerging risks and respond effectively to challenges.

Dedicated engagement with our supply chain is a core focus for this Statement. The work undertaken to build knowledge and capability in our higher risk areas, remains a key aspect of our approach. We continue to enhance our approach to due diligence in collaboration with Slave-Free Alliance, with a key focus on traceability and proactive worker welfare discussions.

Here, our partnerships—particularly our collaboration with Slave-Free Alliance—have played a key role in strengthening this capability. Additionally, we have further enhanced our procurement processes through improved mapping and traceability controls.

We are proud to be signatories to the United Nations Global Compact and the policies and practices specific to Severn Trent are aligned to the UN Guiding Principles on Business and Human Rights, as well as the UN Sustainable Development Goals.

Communication is a critical component of collaboration and a key emphasis remains on ensuring that employees, partners, and peers across our entire value chain are aware of the risks and are trained to spot the signs of modern slavery. As the context in which we operate continues to change, raising the awareness of our people is an important contributor in our efforts to eliminate the business risks and to protect those at risk of harm.

This Statement reflects our ongoing commitment and the collaborative efforts of our teams and stakeholders. We welcome feedback to help shape and strengthen our approach.

This Statement was approved by the Board of Directors of Severn Trent Plc on 17 September 2025 and is signed on its behalf by:



Liv Garfield
Chief Executive
Severn Trent Plc

This Statement, which constitutes our Group's Anti-Slavery and Human Trafficking Statement for the financial year ended 31 March 2025, is made pursuant to section 54 (1) of the Modern Slavery Act 2015 (the 'Act'). It is made on behalf of Severn Trent Plc and its Group Subsidiaries, namely Severn Trent Water Limited, Severn Trent Services Defence Limited, Severn Trent Services Operations UK Limited, Severn Trent Green Power Limited and Hafren Dyfrdwy Cyfyngedig.

This is our tenth statement and outlines our processes and procedures to mitigate the risk of slavery and human trafficking within our Group during the financial year ending 31 March 2025. Our previous statements can be found here.

We are not at all complacent and remain committed to keeping our approach under continual review.

KEY ACTIONS WE HAVE TAKEN DURING THE YEAR

Our Modern Slavery Working Group undertook dedicated incident response training delivered by our partners at Slave-Free Alliance. The training also led to an updated Incident Response and Escalation Handbook.

Slave-Free Alliance supported with capability building through the delivery of proactive supplier assessments and worker welfare discussions – helping minimise the risk of labour exploitation.

Collaboration with Utilities Against Slavery to develop a suite of resources to drive awareness across our internal teams, and anyone working across our operations.

Enhanced mapping and traceability within our procurement process, prioritising such activities for our solar supply chain as we expand our solar energy provision within the Severn Trent Group.

Our Modern Slavery Working Group created a dedicated communication plan to raise awareness of modern slavery across the Group and this is considered to be a key contributor in a 99% completion rate of Modern Slavery e-learning training.



OUR PURPOSE

At Severn Trent, we are driven by our purpose – taking care of one of life's essentials. When we are united by our clear social purpose, we can drive positive change and deliver positive outcomes for all our stakeholders – our customers, colleagues, investors, regulators and Government, the society we live in and the environment we depend on.

Now, more than ever, we know that what we do really matters to the families, businesses, and communities we serve. This is why our values of Having Courage, Showing Care, Taking Pride and Embracing Curiosity are so important to us. Being a company that can be trusted, taking care of the environment, helping people to thrive, and providing the best value service, means we all need to be focused on living our values by 'Doing the Right Thing', every single day – the Severn Trent way.



A comprehensive approach to modern slavery

Our corporate strategy and our Business Model provides us with the direction for delivering on our purpose. Caring for people in our region and driving positive change underpin the approach we take to minimise the risk of modern slavery within our value chain.

This Statement outlines the key areas within our approach which guide us in robustly and effectively identifying and addressing modern slavery and labour exploitation risks within our business and supply chain. The Statement aims to meet the disclosure guidance set out by the Home Office in the updated guidance on compliance with section 54 of the Modern Slavery Act 2015, released in March 2025.

OUR BUSINESS AND SUPPLY CHAIN

1. GOVERNANCE AND POLICIES
2. RISK AND DUE DILIGENCE
3. TRAINING
4. MONITORING AND EVALUATION

OUR APPROACH

Developing our Modern Slavery Statement

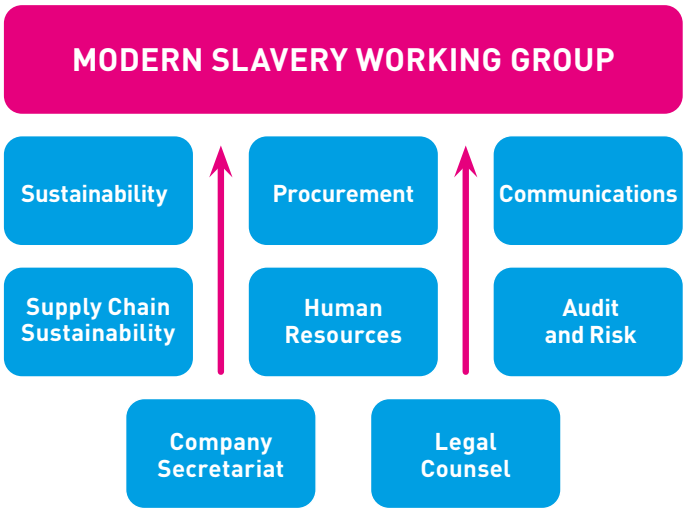
To ensure our Modern Slavery Statement meets the legislative requirements under the Modern Slavery Act 2015, Severn Trent has put into place a structured and collaborative approach to information gathering and internal consultation.

As part of this process, our Modern Slavery Working Group conducts horizon scanning to identify evolving threats, regulatory changes, and best practices related to modern slavery and human rights. This includes reviewing guidance from government bodies, NGOs, and industry alliances, as well as engaging with external partners such as Utilities Against Slavery and Slave-Free Alliance.

Findings and recommendations from the Working Group are reported to the Severn Trent Plc Corporate Sustainability Committee, which provides strategic oversight and ensures alignment with our broader ESG objectives. The Corporate Sustainability Committee, in turn, reports to the Severn Trent Plc and Severn Trent Water Limited Board at each Board meeting, providing updates on the work undertaken during the period.

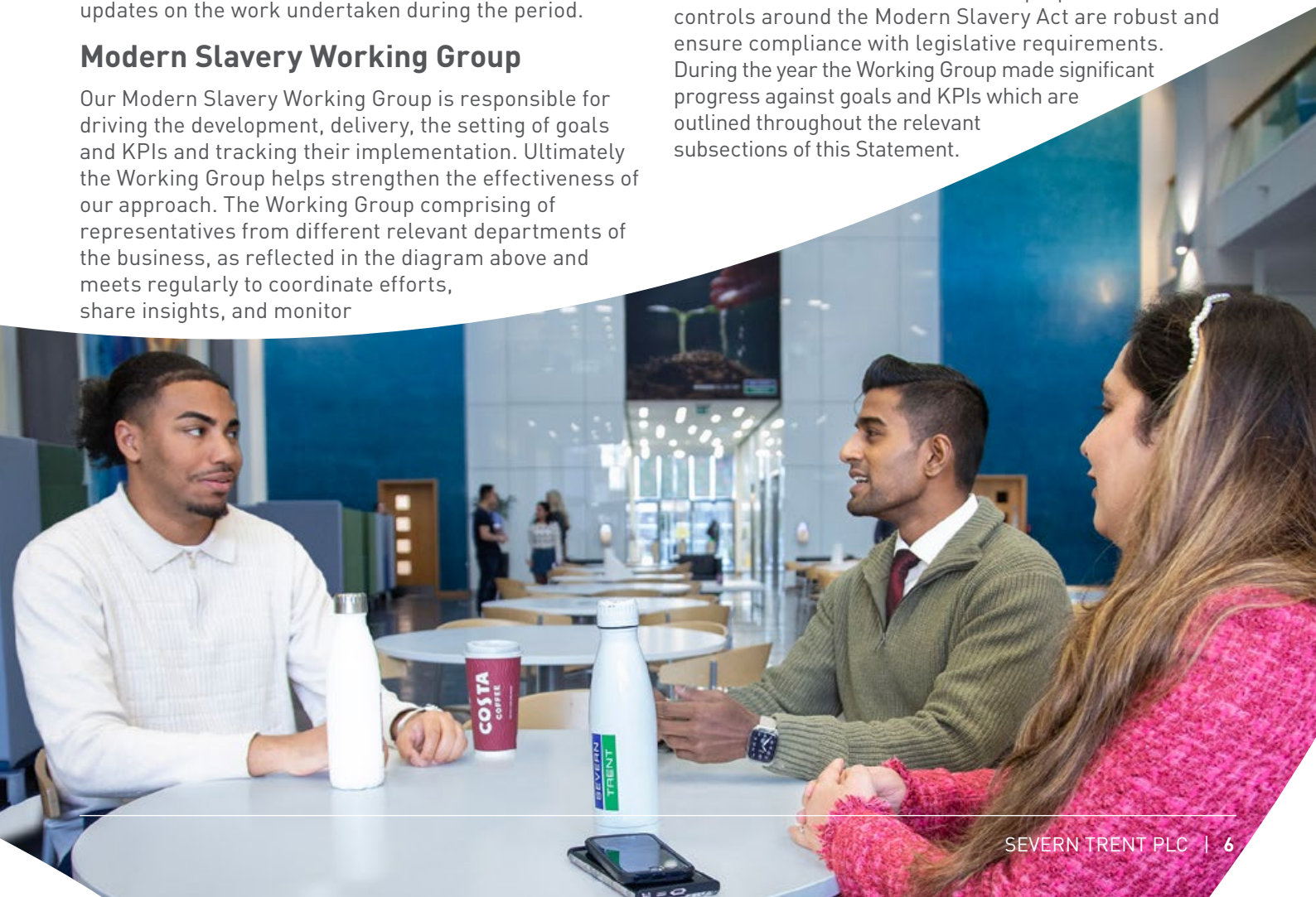
Modern Slavery Working Group

Our Modern Slavery Working Group is responsible for driving the development, delivery, the setting of goals and KPIs and tracking their implementation. Ultimately the Working Group helps strengthen the effectiveness of our approach. The Working Group comprising of representatives from different relevant departments of the business, as reflected in the diagram above and meets regularly to coordinate efforts, share insights, and monitor



developments in legislation, industry standards, and emerging risks and ultimately to ensure we take a cohesive approach across all aspects of our business. This year we made efforts to widen Working Group membership to ensure better representation from across the Severn Trent Group.

In 2024, we carried out an internal audit to review the Working Group and how it implemented controls and processes to comply with legislative requirements. The review concluded that the Group's processes and controls around the Modern Slavery Act are robust and ensure compliance with legislative requirements. During the year the Working Group made significant progress against goals and KPIs which are outlined throughout the relevant subsections of this Statement.



OUR BUSINESS

Severn Trent Plc is a FTSE100 company. Severn Trent Water ('STW') and Hafren Dyfrdwy ('HD'), are two of 11 regulated water and wastewater businesses in England and Wales, providing high quality services to more than 4.7 million households and businesses in England and Wales. Our non-regulated businesses operate across England, Wales and Scotland.

The primary activities of STW and HD are:

- **Providing clean water:** We provide five million customers across our region with fresh, clean drinking water every day.
- **Treating wastewater:** We treat 3.35 billion litres of wastewater every day, cleaning and returning it to the environment.

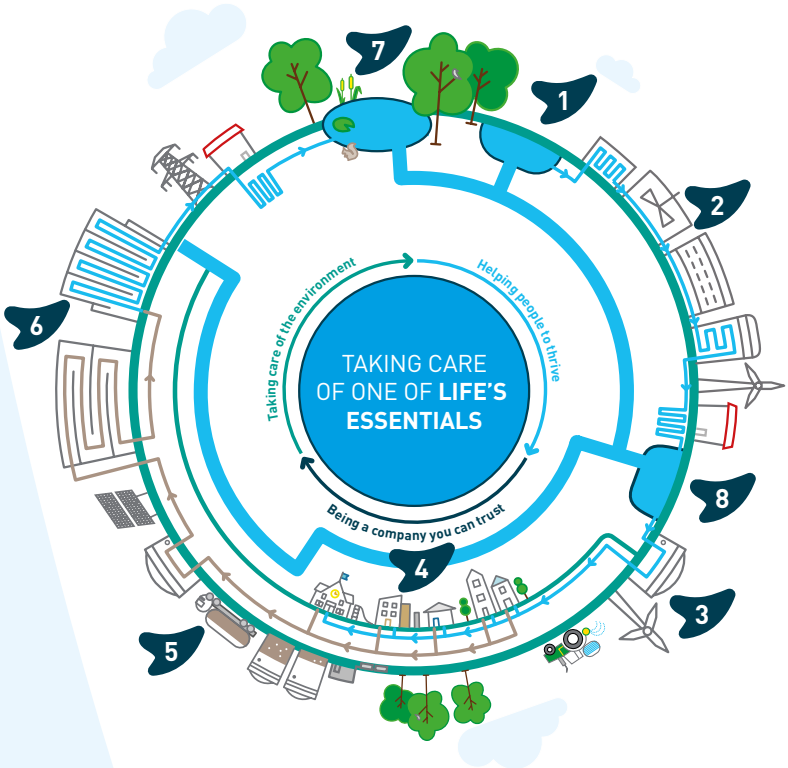
Our non-regulated business

Business Services operates a UK-based portfolio that complements the Group's core competencies and is well positioned to capitalise on market opportunities in these areas:

- **Operating Services:** Operating Services provides a variety of operational water and wastewater services to private businesses across the UK.
- **Green Power:** Severn Trent Green Power generates renewable energy from anaerobic digestion, hydropower, wind turbines and solar technology.
- **Property Development:** Our Property Development business manages the sale of surplus land.

Our Business Model

We provide clean water and wastewater services and develop renewable energy solutions through our businesses. In the course of providing these services, we create social and environmental value.



1. **Collect raw water:** We collect water from reservoirs, rivers and underground aquifers across our region
2. **Clean raw water:** Our groundwater and surface water treatment works clean raw water to the highest standards, making it safe to drink.
3. **Distribute clean water:** Our network of pipes and our enclosed storage reservoirs bring a continuous supply of clean water direct to our customers' taps.
4. **Customers enjoy our services:** 4.7 million households and businesses use our services, delivered by a team of over 9,800 employees, and supported by our contact centres, always ready to help.
5. **Collect wastewater:** Our network of sewers and pumping stations collect wastewater from homes and businesses and take it to our wastewater treatment works.
6. **Clean wastewater:** We carefully screen wastewater and treat it in our wastewater treatment works to meet stringent environmental standards.
7. **Recycle water to the environment:** We safely return treated water to rivers and watercourses.
8. **Green energy:** The green energy we generate through our Business Services activities contributes to meeting our net zero targets and keeping our energy costs down.

REAL LIVING WAGE AND LIVING HOURS EMPLOYER

We are proud to be an accredited real Living Wage Employer, demonstrating our commitment to paying all directly employed staff a wage that reflects the true cost of living. This commitment extends throughout our supply chain, with 100% of applicable suppliers agreeing to pay the real Living Wage to applicable employees working on our contracts. Through ongoing engagement and communication, several of our supplier partners have also achieved accreditation from the Living Wage Foundation. Paying a living wage is a key safeguard against forced labour and exploitation and is a mandatory requirement for all new contracts.

In 2024, we became an accredited Living Hours Employer

This initiative ensures that workers have access to stable and predictable working hours, supporting a decent standard of living and currently applies to all our employees. The Living Hours standards include:

- A contract that reflects actual hours worked
- A minimum of 16 hours per week (with flexibility for employees to request fewer)
- At least four weeks' notice for any changes to working patterns

We have also committed to engaging with our supply chain over the next two years to drive awareness and promote adoption of Living Hours; taking a targeted approach for those supplier categories of higher impact to ensure expectations of them are clear.

We also offer a comprehensive range of services and benefits to support our employees' physical, mental, and financial wellbeing. For more information on how we support our colleagues, please refer to our latest **Annual Report** available on our website.

OUR WORKFORCE

We directly employ 10,094 people across 117 UK sites, most of them at locations throughout the East and West Midlands, as well as in North and Mid-Wales.

TOTAL EMPLOYEES (including contractors and agency)	**10,781**
CUSTOMER OPERATIONS EMPLOYEES	**4,832**
CUSTOMER SOLUTIONS EMPLOYEES	**2,221**
CAPITAL DELIVERY EMPLOYEES	**2,227**
OFFICE EMPLOYEES	**814**
PERMANENT STAFF	**10,094**
CONTRACTORS & TEMPORARY	**687**

Numbers average over 2024/25



Our resources and relationships:

- **Physical assets:** We maintain over 50,000 km of clean water pipes, over 93,500 km of sewer pipes, and around 130 water and 1,000 wastewater treatment works.
- **Natural resources:** We take care of some of the UK's most impressive natural resources and make them accessible to support the health and wellbeing of communities.
- **Financial Capital:** Our RCV is over £13.7 billion. Our net debt represents 62.7% of our RCV.
- **Technologies:** We rely on technology every day to communicate, store and manage data, operate our assets and monitor our operations. We are always exploring innovative technology to drive continuous improvement.
- **Our people and culture:** We look to attract, develop and retain talented people from all backgrounds. We directly employ over 9,800 people.
- **Suppliers and partnerships:** All contracted suppliers are required to sign up and operate in line with our Supply Chain Sustainability Charter.

Our supply chain

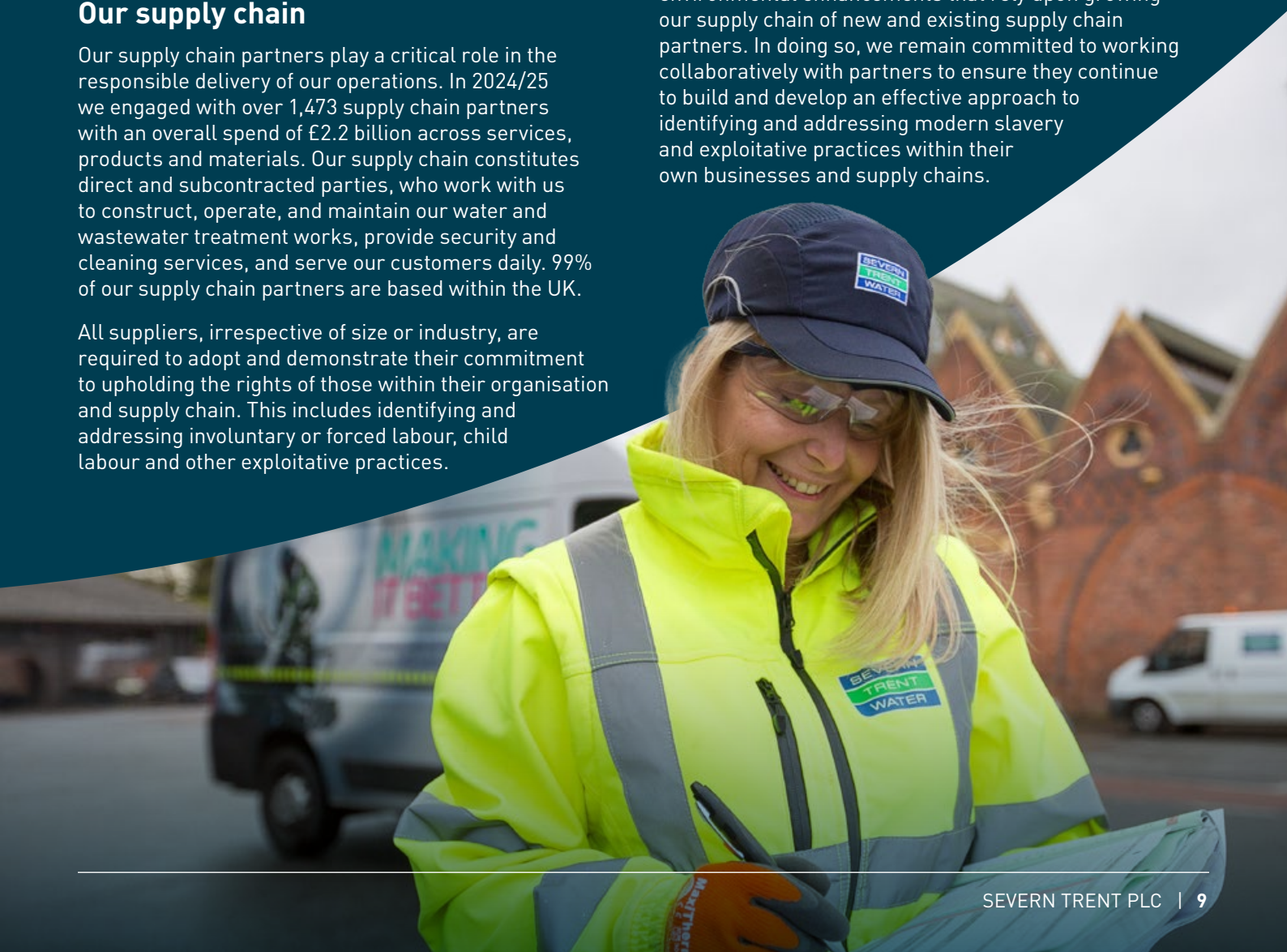
Our supply chain partners play a critical role in the responsible delivery of our operations. In 2024/25 we engaged with over 1,473 supply chain partners with an overall spend of £2.2 billion across services, products and materials. Our supply chain constitutes direct and subcontracted parties, who work with us to construct, operate, and maintain our water and wastewater treatment works, provide security and cleaning services, and serve our customers daily. 99% of our supply chain partners are based within the UK.

All suppliers, irrespective of size or industry, are required to adopt and demonstrate their commitment to upholding the rights of those within their organisation and supply chain. This includes identifying and addressing involuntary or forced labour, child labour and other exploitative practices.

Given the breadth and complexity of our supply chain, we recognise a heightened likelihood of encountering areas of potential concern. In response, we apply an enhanced level of scrutiny to sectors that pose a higher risk to our business. These priority areas include Facilities Management (including Grounds Maintenance, Cleaning and Security), Construction, Waste Management, and Logistics and Transport. Our biennial review with Utilities Against Slavery ('UAS') confirmed that these remain our priority areas when managing risk within our direct supply chain.

We continue to explore a tailored and proportionate approach to building our understanding of risk beyond our direct supply chain partners, whilst recognising limitations in terms of supply chain complexity, maturity and availability of credible software solutions to assist. As Severn Trent Green Power ('STGP') expands its renewable energy offering, we have placed strategic focus on the solar supply chain. Mapping and traceability have become integral to our procurement process, enabling us to deepen our understanding and build capability. This approach will serve as a foundation for developing a formal framework to address traceability across other product categories.

Over the next five years, we have committed to an ambitious capital programme of service and environmental enhancements that rely upon growing our supply chain of new and existing supply chain partners. In doing so, we remain committed to working collaboratively with partners to ensure they continue to build and develop an effective approach to identifying and addressing modern slavery and exploitative practices within their own businesses and supply chains.



PARTNERSHIPS SUPPORTING OUR BUSINESS AND SUPPLY CHAIN

In an evolving external landscape, collaboration and working in partnership with expert partners, peers, suppliers and other global organisations, remains central to our approach. It ensures we continuously challenge, inform and strengthen our understanding and ways of working. Our partnerships are founded on transparency, and a shared commitment to effectively identify and address involuntary or forced labour, child labour and other exploitative practices. We deliver this through shared expertise and learning, co-development of tools and resources and delivery of training.

Slave-Free Alliance ('SFA')

We are proud to be in our eighth year of partnership with SFA, who act as a critical ally in ensuring we remain effective, focused and proactive in addressing potential modern slavery and labour exploitation risks. This year, we have continued to develop and deliver bespoke procurement strategies, conducted supplier assessments and worker welfare discussions, and enhanced our internal training around responding to modern slavery.

Utilities Against Slavery ('UAS')

Severn Trent remains a member of UAS, a sector-led group working to drive consistency and best practice in the approach to addressing potential modern slavery and labour exploitation risks across a shared supply chain. In addition to expert briefings on supplier assessment tools, site assessments and solar procurement, the sector-led group has developed multi-lingual awareness posters, video briefings, training for procurement colleagues and a sector toolkit on responding to modern slavery. For the year ahead, areas of focus will be: exploring the feasibility of shared supplier assessments and identifying further collaborative opportunities with the Supply Chain Sustainability Schools and Built Environment Against Slavery. For more information, refer to the UAS Chair's report here.

Supply Chain Sustainability School ('SCSS')

Our continued partnership with the SCSS directly supports our commitment to build supplier knowledge and capability to effectively identify and address modern slavery and exploitative practices within their own business and supply chain. Through the SCSS platform, our suppliers can access a wide range of free operational toolkits, learning resources and events including 'Responding to modern slavery with lived experience'. This takes away the overheads or capacity challenge of suppliers developing and delivering these services in-house.

EcoVadis

Our partnership with EcoVadis focuses on building supplier maturity in managing and reporting against key environmental and social impact risks, including labour and human rights. Having renewed our partnership this year, we are developing our strategy to ensure we assess more high-impact suppliers. We aim to further strengthen our understanding of our risk profile and build supplier capability by using the platform's 'Corrective Action' function where required. EcoVadis Academy provides further resources to assist with this.

UN Global Compact

We are members of the UN Global Compact ('UNGC'). Each year as part of our 'Communication on Progress' we reaffirm our support for the Ten Principles of the UNGC, which includes the areas of Human Rights and Labour. In 2024, two representatives of our Modern Slavery Working Group completed the Human Rights Accelerator Programme, which the UNGC delivers in partnership with Shift, a leading centre of expertise on the UN Guiding Principles and Human Rights, to help organisations develop their approach to Human Rights. Emphasis will be place on using this learning to help build resilience and knowledge within our internal working group and therein across the organisation.

Advancing our partnerships

Our understanding of this global issue is constantly evolving as we learn from external partners, and as we reflect internally. From the assessment of social risk and opportunities in sourcing strategies by our Procurement teams, to potential indicators identified through our recruitment and on boarding process, we continuously seek opportunities to learn and improve.

GOVERNANCE FRAMEWORK

Governance Framework

THE BOARD

The Board's role is to ensure the long-term sustainable success of Severn Trent by setting our strategy through which value can be created and preserved for the mutual benefit of our shareholders, customers, employees and the communities we serve. The Board provides rigorous challenge to management and ensures the Group maintains an effective risk management and internal control system.

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THE BOARD DELEGATES CERTAIN MATTERS TO ITS PRINCIPAL COMMITTEES - WHICH REPORT TO THE BOARD AT EVERY MEETING

- **AUDIT AND RISK COMMITTEE**
- **CORPORATE SUSTAINABILITY COMMITTEE**
- **NOMINATIONS COMMITTEE**
- **REMUNERATION COMMITTEE**
- **TREASURY COMMITTEE**

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THE CHIEF EXECUTIVE AND THE SEVERN TRENT EXECUTIVE COMMITTEE ('STEC')

Responsibility for the development and implementation of the Group's strategy and overall commercial objectives rests with the Chief Executive, who is supported by STEC.

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DISCLOSURE COMMITTEE

An Executive Committee responsible for overseeing the Group's compliance with its disclosure obligations, considering the materiality, accuracy, reliability and timeliness of information disclosed and assessment of assurance received.

BUSINESS AND STRATEGIC LEADS

Ensure that policies, process, and practices are implemented and adhered to within their individual areas of work and responsibility and the potential risks of modern slavery are mitigated within each directorate.

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MODERN SLAVERY WORKING GROUP

Representatives from across the business ensure our policies, processes, and practices are aligned to mitigate potential risks of modern slavery. The Working Group also produces the Anti-Slavery and Human Trafficking Statement on behalf of the Group.

We pride ourselves on having a high-functioning, independent and diverse Board and being transparent in all that we do. Our Board-led Governance Framework ensures that the Board remains effective in both making decisions and maintaining oversight.

Our governance structure

Oversight of modern slavery risk is firmly embedded at the highest levels of our governance structure, ensuring strategic accountability and leadership focus. The Board of Directors holds ultimate accountability for ensuring that the Group meets its legal and ethical obligations under the Modern Slavery Act 2015. The Board reviews and approves our Anti-Slavery and Human Trafficking Statement each year and receives regular updates on our risk management activities related to modern slavery. This oversight ensures that the Board remains informed and engaged in the strategic direction and effectiveness of our approach to preventing modern slavery across our operations and supply chain.

The Board delegates day-to-day oversight of modern slavery risk to the Severn Trent Plc Executive Committee, which is responsible for ensuring that robust policies, effective controls, and adequate resources are in place to manage these risks. The Executive Committee is supported by the Strategic Risk Forum, the Modern Slavery Working Group, and relevant functional strategic leads, who provide regular updates on progress, incidents, and emerging risks. These updates form part of our broader ESG and compliance agenda, ensuring a coordinated and informed approach across the organisation.

Our governance structure enables us to manage risks proactively and transparently, with clear lines of accountability and a commitment to continuous improvement. This is reflected across four key areas:

- **Identification and assessment:** Our Procurement and Supply Chain teams are responsible for identifying and assessing potential modern slavery risks across our operations and supply chains. They conduct regular risk assessments and supplier audits to ensure compliance with our ethical standards.
- **Response and mitigation:** Human Resources leads our response to any identified risks or incidents. This includes implementing corrective actions, engaging with suppliers, and ensuring appropriate remediation steps are taken.
- **Governance and oversight:** The Modern Slavery Working Group drives the development, delivery and ongoing effectiveness of our approach. Severn Trent Plc Executive Committee members provide senior level oversight, receiving updates on modern slavery risk management. The Board reviews and approves this statement annually, ensuring accountability at the highest level. In 2024, we carried out an internal audit to review the Modern Slavery Working Group and the implementation of controls and processes to comply with legislative requirements. The review concluded that the Group's processes and controls around the Modern Slavery Act are robust and ensure compliance with legislative requirements.
- **External review and assurance:** To strengthen our approach and ensure independent scrutiny, we engage with external experts including UAS and SFA. These partnerships provide us with valuable insights, benchmarking, and third-party assessments of our modern slavery risk management practices. Their input supports our continuous improvement efforts and helps ensure our policies and procedures remain robust, transparent, and aligned with best practice.



POLICIES

At Severn Trent, our commitment to preventing instances of modern slavery across our operations and supply chain are embedded in our Group policies, which are regularly reviewed and consistently applied throughout our procurement and business practices. These policies are introduced from day one during employee onboarding and are reinforced through ongoing internal communications, awareness campaigns, and active engagement with our supply chain.

Key policies supporting our commitment:

- **Group HR Policy**
  We are proud to foster a diverse and inclusive workplace where everyone has the opportunity to thrive and reach their full potential.
- **Group Health, Safety and Wellbeing Policy**
  We are committed to maintaining a clear Health, Safety and Wellbeing strategy that ensures compliance, promotes safe practices, and supports employee wellbeing everyday. By embedding straightforward standards, encouraging open communication, and demonstrating visible leadership, we aim to create a culture where safety is everyone's responsibility. Through continuous improvement, collaboration with partners, and learning from incidents, we strive toward achieving zero harm in all that we do.
- **Financial Crime, Anti-Bribery and Corruption Policy**
  We take a firm stand against all forms of financial crime, including bribery, fraud, and tax evasion.
- **Procurement Policy**
  We embed environmental and social considerations, including Modern Slavery, within all procurement and supplier selection decisions.
- **Sustainable Supply Chain Charter**
  Sets out the principles and behaviours we expect all supplier partners to live and breathe through their work with us.
- **Doing the Right Thing**
  Our values guide how we work every day. This means acting with integrity, treating people fairly, complying with laws and standards, and creating a safe, inclusive environment. Everyone is encouraged to speak up if something does not feel right.
- **Speak Up Policy**
  We want everyone to feel confident raising concerns. Our independent helpline, SafeCall, is available to all employees, contractors, and partners to report any issues confidentially.
- **Employee Rights**
  We value open dialogue with our people and trade unions. We support freedom of association and collective bargaining, and we work closely with our union partners to ensure all voices are heard when making important business decisions.

Our Escalation and Remediation Policy, first introduced in 2020 and most recently reviewed in 2024, continues to guide our response to any modern slavery concerns raised within our Group. This Policy applies to the whole of Severn Trent Plc, our subsidiaries and our supply chain.

The Policy remains victim-centred and adaptable, enabling us to respond sensitively and effectively on a case-by-case basis. We maintain a clear and transparent process for investigating concerns, ensuring that all colleagues and suppliers are aware of how to escalate issues. We reinforce this through regular internal communications and supplier engagement. While no material changes have been made to the Policy since 2024, we continue to embed its principles across our operations and ensure it remains fit for purpose through ongoing awareness and training.

Whistleblowing procedures remain in place across all Group companies and our supply chain to enable the reporting of any concerns, including any breaches of our Code of Conduct, Doing the Right Thing. We continue to regularly communicate and raise awareness of all available whistleblowing channels, including our confidential Safecall 'Speak Up' line, ensuring that all individuals feel supported and empowered to raise concerns safely and anonymously.



Delivering on our policies

We continue to strengthen our partnerships and processes to ensure we identify and address modern slavery risks across our operations and supply chain.

We maintain a strong partnership with our three recognised trade unions —Unison, GMB, and Unite—who also participate in our Company Forum meetings alongside members of our Senior Leadership, Executive Team and Board. These sessions help us stay connected with employee perspectives and ensure their voices are heard and reflected in our decision-making.

All suppliers and their subcontractors, regardless of industry, size, or location, are expected to follow the principles outlined in our Sustainable Supply Chain Charter.

Our Category and Contract Managers actively monitor supplier performance using scorecards and collaborate with them to close any gaps identified through the EcoVadis Corrective Action Plan.

Embedded within contracts are standard contractual terms including compliance with the Modern Slavery Act, pre-employment checks and adherence to our Sustainable Supply Chain Charter principles. Our Charter sets out our expectations on compliance with the Modern Slavery Act. Our Speak Up Policy is communicated centrally and is available to all employees, contractors, and partners to report any issues confidentially.

We continue to enhance our approach by conducting targeted assessments with suppliers in higher-risk UK industries, developing tailored procurement strategies, and expanding our internal training programmes.

Communicating our policies

Our policies are integrated into the core of our business operations and play a key role in our company induction, ensuring employees are aligned with them from day one. They are readily accessible via our intranet, and we consistently reinforce their significance through training and ongoing communications across multiple internal channels - including targeted campaigns and collaboration with our supplier partners. Our key Group policies are available in full on our website here.



Reviewing our policies

Our approach to modern slavery is supported by our Group policies, which are reviewed regularly and extend across our subsidiaries and supply chain. Since our previous modern slavery statement, Severn Trent has undertaken a comprehensive review of our internal policies to strengthen our approach to preventing modern slavery and human trafficking.

We consider these policies to remain robust and effective, as we regularly review them against emerging risks, stakeholder feedback, and external benchmarks. Where updates were identified as necessary, these have either been implemented or are currently being progressed to ensure our Group policies remains fit for purpose.

RISK ASSESSMENT

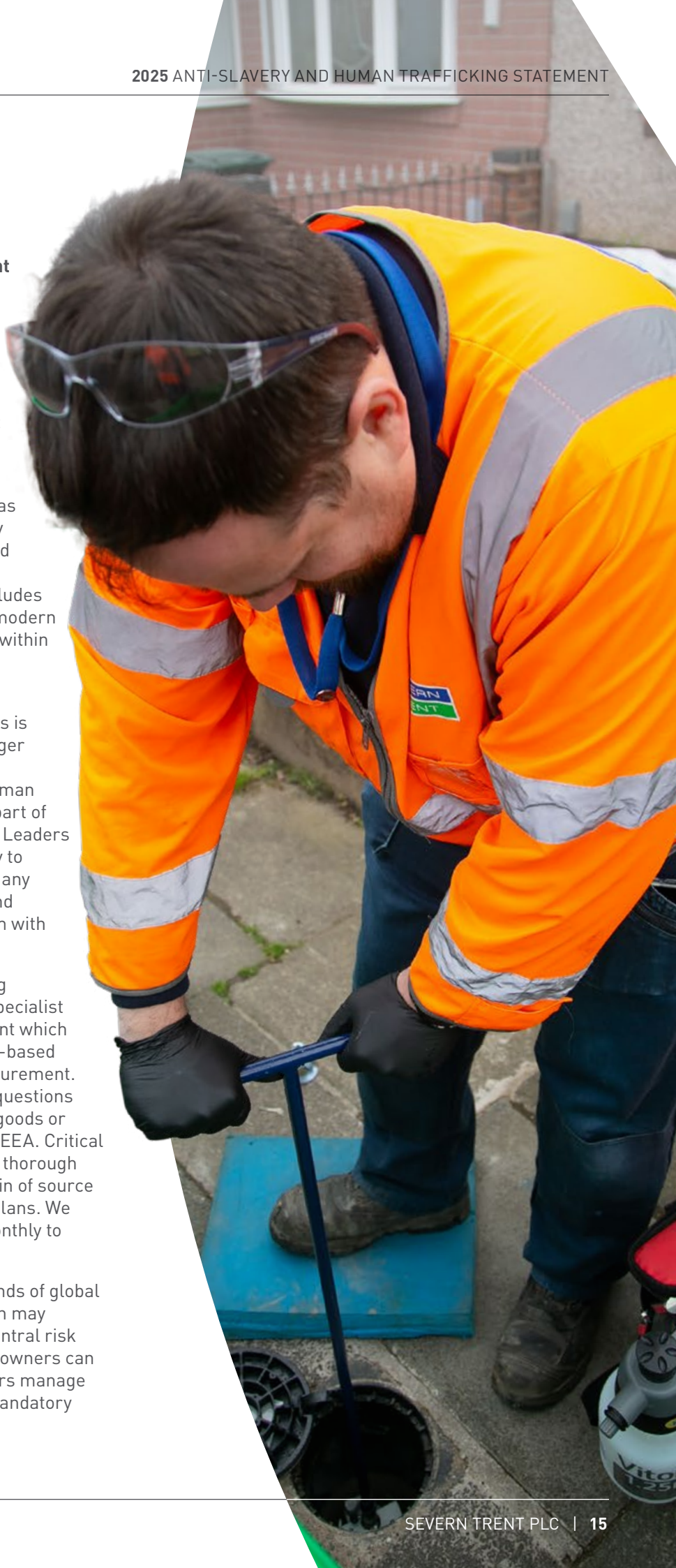
Severn Trent has a mature risk management framework, coordinated via a central risk team, departmental risk coordinators and documented on the company risk management platform (Riskonnect). Our modern slavery risk is classified as an ORM (Operational Risk Management) level risk and is formally signed off at a Strategic Leader level every six months.

Overall, the risk effectiveness is scored as Satisfactory with 11 Risk controls all scored as Satisfactory or Effective. There are three Key Risk Indicators which are regularly monitored to help identify any increased likelihood of a modern slavery incident occurring which includes compliance with mandatory E-learning and modern slavery terms and conditions being included within our contracts.

As part of the work of our Modern Slavery Working Group, risk is reviewed monthly. This is led by a dedicated Risk and Assurance Manager in collaboration with representatives from Procurement and Contract Management, Human Resources and Strategy and Regulation. As part of our three lines of defence process, Business Leaders from Procurement are interviewed biennially to ensure continued compliance and to capture any emerging risks. Modern slavery risk is second line assured by our Risk and Assurance Team with Internal Audit providing third line assurance.

During our supplier approval and on boarding process, a dedicated Category or Contract Specialist conducts a supplier heat mapping assessment which is captured in SAP Ariba, an intelligent cloud-based management software for sourcing and procurement. In June 2025, we updated our heat mapping questions to include global-economic factors, such as goods or services sourced from outside the UK or the EEA. Critical suppliers (such as chemicals) undergo more thorough supply chain mapping to understand the origin of source materials, and have documented continuity plans. We send a summary of our top supplier risks monthly to senior management within Procurement.

SAP Ariba has a functionality to scan thousands of global news feeds providing any news articles which may suggest a risk to one of our suppliers. Our central risk team monitors these and individual contract owners can follow their suppliers. To help contract owners manage risk within their contracts, they undertake mandatory supplier risk training.



RISK MAPPING OUR SUPPLY CHAIN

Building on our overarching approach to supplier mapping and risk assessment, we utilise a range of tools and expert insights to identify and assess risks of modern slavery throughout our supply chain.

Existing tools, including Ariba Risk Assessment module and EcoVadis, provide real-time in-depth insights into our registered suppliers including; Google newsfeeds, country risk scores based on World Economic Forum data; and environmental and social evaluations, including labour compliance. Labour and human rights is one of four pillars that EcoVadis, an independent sustainability ratings platform, assesses our suppliers against. This section includes:

- Employee health and safety;
- Working conditions;
- Social dialogue;
- Career management and training;
- Child labour;
- Forced labour and human trafficking;
- Diversity, Equity and Inclusion; and
- External Stakeholder human rights.

Sustainability experts at EcoVadis complete assessments independently and review evidence to validate an organisation's response.

SFA and UAS play a key role in keeping us informed of emerging risks and specifically reviewing our high-level risk assessment of Severn Trent's supplier categories. Endorsed by UAS members, SFA conducted a desktop risk assessment at direct supplier-category level to help identify the level of risk across our shared supply chain. To further our understanding at a Severn Trent level, SFA conducted Category-specific Procurement and Contract Manager interviews. These helped to gain a detailed understanding of the work undertaken across Severn Trent contracts, the suppliers delivering the work, and any measures adopted that mitigate any potential risks e.g. site access requirements, inductions, and qualifications.

As a result of these sessions, SFA concluded that due to mitigating measures already adopted by Severn Trent and our existing suppliers, there was no heightened risk associated with these categories that required additional mitigation measures. Recognising the heightened risk associated with Facilities Management (including Grounds Maintenance, Cleaning and Security), Construction, Waste Management and Logistics and Transport, we remain focussed on enhancing our approach to due diligence }and ongoing engagement with suppliers in these areas.



TAKING ACTION

Taking action with our supply chain

We remain focused on assessing suppliers beyond compliance; adopting different levels of engagement and assessment based on known areas of greater risk. Our approach continues to evolve, ensuring we improve our understanding of any risk associated with individual suppliers and their capability to address this within their organisation, and wider supply chain.

We will only work with suppliers who share our strong commitment to uphold the rights of their workers and those across their supply chain, and who can demonstrate delivery of this beyond policy. As an organisation we have a responsibility to engage and influence how our supply chain identifies and addresses modern slavery and exploitative practices. We work with them, where needed, to develop an effective approach.

We collaborate with suppliers who provide temporary staff to ensure they follow the same compliance procedures as we do for all workers during recruitment and onboarding.

All elements of sustainability, including the consideration of environmental and social risk and opportunity, form a key part of all procurement activity and ongoing supplier engagement. Sustainability impacts are included within all sourcing strategies. Procurement and Contract Managers are required to highlight areas of potential concern, including modern slavery, and the strategy proposed to address this through procurement. These are developed in collaboration with subject matter experts and all sourcing strategies, contract award and extension approvals require mandatory sustainability sign-off before progressing. Our relevancy matrix supports in this process, highlighting key sustainability issues relevant to each supplier category; including modern slavery and worker welfare.

Our minimum expectation across our supply chain

All suppliers, irrespective of industry, size and location, are expected to meet our standards set out in our Sustainable Supply Chain Charter and undertake assessment at supplier selection stage. This includes:

- **Supplier evaluation:** Suppliers must confirm that key elements, such as risk assessment, supplier due diligence and training and awareness, form part of their approach to identifying and addressing modern slavery within their organisation and supply chain. This is a common approach adopted by members of UAS. Our Procurement and Contract Management Team test and examine awareness and risk mitigation at the earliest stage, developing an improvement plan if required.
- **Real Living Wage and Living Hours:** We mandate that all applicable suppliers and their subcontractors embed the real Living Wage as a minimum hourly salary, updated annually. In 2024, we launched our commitment to Living Hours; delivering an awareness session to our supply chain partners ahead of embedding this requirement fully over the next year.
- **Embedded within contracts:** Standard contractual terms include compliance with the Modern Slavery Act, pre-employment checks, adherence to our Sustainable Supply Chain Charter principles, and an expectation that all annual increases of real Living Wage are applied within an appropriate timeframe.

Taking action with our own practices

Our internal controls and risk management processes are regularly reviewed to minimise potential risks. These checks include, but are not limited to:

- **Right to Work verification including proof of address check and imposter checks;**
- **Criminal record checks; and**
- **Occupational health assessments.**

To further safeguard our workforce, we conduct additional due diligence, such as monitoring for duplicate national insurance numbers and shared bank accounts. If any concerns arise, our HR Team will discreetly and sensitively contact the individual to clarify the situation before escalating, if necessary. Completion and clearance of these checks are mandatory for permanent employees before they begin work with us. We also require our supply chain partners to implement the same rigorous pre-employment checks for temporary staff.

We continue to work with SFA to review and strengthen our recruitment practices for both permanent and temporary staff—whether hired directly or indirectly. This partnership helps us validate our approach and identify any risks or best practices to incorporate.

PHASE 1

We developed bespoke supplier selection questions, tailored to the industry and activity undertaken, and based on the principles of understanding, capability and commitment. Examples include outlining the risks apparent within their supply chain or a scenario-based question to assess how an organisation would respond to a potential instance of forced labour.

PHASE 2

For each prospective supplier, we conduct an interview to test the response provided in Phase 1 and gain greater insight into the tangible measures taken to address risks of modern slavery. Adopting this approach allows us to not only assess and build knowledge and capability with those suppliers who are successful in winning our contract, but those who may go on to work with our peers.

PHASE 3

Depending upon the outcome of Phases 1 and 2, we expect suppliers to undertake a management-level assessment led by SFA – either pre- or post-contract award. This collaborative session aims to address any potential gaps in their approach, build knowledge in this area and jointly develop an improvement plan if required.

PHASE 4

Where applicable, our Supply Chain Sustainability Team will support delivery against an improvement plan and ongoing engagement, with performance managed through Contract Management. In some instances, we conduct worker welfare discussions to ensure measures put in place are operationally effective.

Our approach for higher risk areas

Our targeted approach enables us to proactively apply an additional level of focus to those supplier categories that potentially pose a higher risk. This allows us to develop a bespoke engagement plan that seeks to assess a supplier's understanding of the issues relevant to their sector. It gives us the capability to address this through the delivery of our contract and importantly, builds commitment and willingness to work with us and our expert partners to develop and address this global issue collaboratively.

As outlined within the 'Risk' section, our focus this year has been within our direct supply chain, and those who operate in Facilities Management (including Grounds Maintenance, Cleaning and Security) and Waste Management, as well as other areas identified as potentially higher risk within Sourcing Strategy stage i.e. those reliant on sub-contracted workforce.

Over the last two years, we have gained valuable insights through delivering this approach and will continue to develop and share learnings so that our approach remains effective and can be adopted more widely across other supplier categories. Our focus now shifts to building internal capability, specifically within the Procurement and Contract Management Team, through self-serve resources and dedicated training to ensure we deliver against our commitment to deliver worker welfare discussions across our direct supply chain.

> *Slave-Free Alliance are proud to continue supporting Severn Trent in the delivery of its Modern Slavery Supplier Assurance Programme. This year, SFA partnered with Severn Trent to deliver modern slavery supplier management assessments. These assessments have enabled Severn Trent to collaborate with new suppliers and proactively understand and address any potential risks within their operations and supply chains. This programme demonstrates the level of maturity Severn Trent has reached and shows continuous improvements in its approach. The business remains committed to working collaboratively with suppliers, raising of awareness of modern slavery, identifying vulnerable workers and poor working practices and protecting workers in its operations and supply chains.*
>
> **Ellie,** Slave Free Alliance

To date we have had two potential cases of modern slavery raised and investigated within our supply chain. Both instances were investigated thoroughly in line with our Escalation and Remediation Policy, and in full collaboration with the suppliers involved. Both investigations concluded that no modern slavery activities were identified. Further details of the investigation can be found in our 2023 Modern Slavery Statement (pg 11).

Solar: Addressing impact on climate change, with a focus on human rights.

Severn Trent Green Power ('STGP') generates renewable energy from anaerobic digestion, hydropower, wind turbines and solar technology. In July 2024, STGP announced plans to build four new large-scale solar farms, marking a significant step in expanding our renewable energy capacity and reducing our carbon footprint. As we grow our solar capabilities we are conscious of the human rights challenges the solar industry faces, particularly around forced labour in key international supply chains. We are committed to working with our supply chain partners to mitigating these risks within our business.

Guided by our expert partners SFA, our approach to supplier assessment and selection is founded on the following principles:

- **Supplier education and awareness:** Assess and improve supplier knowledge and understanding of the human rights risks associated with the renewables industry. This includes but is not limited to raw materials extraction, product manufacturing and logistics, asset construction and ongoing management.
- **Supplier collaboration and engagement:** Promote opportunities for collaboration with engaged supply chain partners to continuously improve our collective capability to actively identify and address exploitation throughout operations and the supply chain. We will take a tailored due diligence approach at each stage of the procurement lifecycle.
- **Transparency and mapping:** Strive to improve transparency, traceability and visibility of our supply chain through mapping. We will ensure this commitment is a pre-requisite to working with us.
- **Sector leverage and collaboration:** Use our collective sector leverage to promote change, collaborate and adopt shared ways of working through our partnership with UAS.

We have brought these principles into operation through enhanced desktop screening, supplier selection questions, initial assessment and contractual clauses. They will continue to form a key part in our next stage of in-depth assessment and ongoing engagement. Action will include traceability assessment and development of a collaborative action plan, to include worker welfare discussions. We will provide an update on both our approach taken and learnings in our next Statement.



TRAINING

Stakeholder engagement to develop and facilitate training

Everyone who works for Severn Trent has a mandatory requirement to complete a modern slavery e-learning module to ensure company-wide awareness. The training was developed by our partners SFA and this year was refreshed by our Academy team with the content and functionality reviewed by our Modern Slavery Working Group.

With the expert guidance of SFA, we are currently reviewing our overarching training package to ensure it remains effective in raising awareness. We are also empowering teams to identify and address concerns around modern slavery and exploitative practices. Areas of focus include worker welfare discussions, responding to concerns on site, and working in collaboration with UAS to develop enhanced training for Procurement and Contract Management colleagues.

Targeted training

We remain committed to building awareness, knowledge and capability with our suppliers, supporting them and working collaboratively to address any gaps within their approach. Our partnerships play a key role in our ability to do this.

Through our partnership with the Supply Chain Sustainability School, we are proud to be able to offer all suppliers access to free training, tools and resources on modern slavery. This is particularly valuable for SME and micro-SMEs, who may not have the resource or capability to deliver bespoke training for their employees. We continue to promote this resource, and build wider awareness of the issue, through a range of mechanisms, including supplier on-boarding events, training events and dedicated supplier communications. Our targeted approach to supplier assessment and engagement allows us to provide tailored 1:1 support, guided by our expert partners at SFA.

Working closely with UAS and Built Environment Against Slavery, we plan to offer a series of virtual events for our shared supply chain. Topics include 'Tackling modern slavery through informed action and industry collaboration' and 'the role of ethical supplier audits'. We will support this further with the launch of a new Supplier Summit Programme in the New Year, which will include an interactive session on responding to modern slavery concerns on site.

Continuing to raise awareness

In addition to the mandatory training provided to employees, we continue to raise awareness of modern slavery through resources available on our intranet platform, 'On Tap'. This includes guidance on identifying the signs of modern slavery, ways to report concerns, and signposts to external educational resources from our partners the SFA and the Supply Chain Sustainability School. Our modern slavery awareness-raising involves a combination of internal and external communication plans to provide colleagues and suppliers with actionable insights on our collective role to identify and address modern slavery through emails, intranet articles and regular updates. For Anti-Slavery Week 2024, Severn Trent shared key messages across all our different communication channels including an article and poster campaign on identifying and spotting the signs of modern slavery, SFA webinars and a video message from James Jesic, our Capital and Commercial Services Director.



EVALUATING OUR PERFORMANCE

We have developed Key Performance Indicators ('KPIs') to help us to monitor and report on the effectiveness of our actions. We also monitor a wider range of metrics internally. Our KPIs have evolved in line with our approach, and we have included both qualitative and quantitative measures to provide a holistic view of our performance.

Progress against our KPIs during 2024/25

KPI	TARGET	PROGRESS
ORGANISATIONAL CULTURE Having the right culture is fundamental to our approach.	**>8/10**	**8.7/10** – The score given to Severn Trent by employees answering the question: 'If I suffered or witnessed wrongdoing at work, I'd be confident Severn Trent would respond appropriately'. We are proud of our achievements, with our annual employee engagement score being the highest it's ever been. Placing us in the **Top 2%** of energy and utility businesses globally.
REPORTING OF POTENTIAL RISKS Ensuring that our people and supply chain are confident to report perceived risks.	Develop a culture of trust amongst our people and supply chain.	**No reported instances** of modern slavery or potential concerns have been raised this year. Refer to our 'Speak Up' Policy (page 13) for more information.
SUPPLIER DUE DILIGENCE AND ADHERENCE The greatest risk of the occurrence of modern slavery lies within our supply chain. Our approach is focused on our highest risk categories.	**100%** of contractors are signed up to our Supply Chain Charter.	As a minimum, all suppliers are required to commit to and deliver against the principles outlined within our Charter. Our approach to proactive supplier assessment and engagement demonstrates our commitment to addressing this issue collaboratively, working with our suppliers and peers to drive best practice.
TRAINING AND AWARENESS Company wide and targeted training focused on impact.	95% of employees completed modern slavery e-learning.	**99%** of employees have completed modern slavery e-learning by the end of 2024/25.

Focus areas for 2025/26

We seek to continuously improve our approach to identifying and addressing potential modern slavery risks

1. Broaden our partnership work to enhance awareness and develop actionable plans within a broader suite of our business areas.
2. A review of our recruitment process, including employee checks with support from SFA.
3. Continue to expand our worker welfare discussions on supplier sites.
4. Work with our partners to accelerate our organisational approach to addressing human rights.
5. Conduct a thorough review of broad and specialised training (e.g. incident response) to enhance awareness, understanding and efficacy in addressing modern slavery. Seek external partner support where needed.
6. The launch of a new Supplier Summit Programme in the New Year in partnership with UAS.

Outcome of the organisation's approach

By raising awareness and enhancing training we further help our people to better identify the risks of modern slavery and thus the opportunity to better monitor and evaluate. We have taken steps to enhance Modern Slavery Working Group capability through incident response training. We have also further enhanced our internal communications to support awareness (both highlighted in earlier sections). The work undertaken to improve Working Group capability was a key change this year and as outlined in our objectives for next year, greater collaboration with our partners to enhance training and awareness around a range of areas (worker welfare, incident response, insourcing checks, and solar supply chain to name a few) will help improve monitoring and evaluation into the future. Our modern slavery risk remains well documented in Riskonnect, our company risk management platform. The 11 documented controls are all rated Satisfactory or Effective and are regularly reviewed by the working group as a standard agenda item at Modern Slavery Working Group meetings.



CONCLUSION

Our 2025 Anti-Slavery and Human Trafficking Statement outlines the progress we have made over the past year in reviewing, assessing and strengthening our approach to addressing and mitigating modern slavery risks across our business and supply chain. Modern slavery remains a critical issue that demands ongoing vigilance and a firm commitment to eradication – an imperative reinforced by the updated guidance issued by the Home Office in March 2025.

We remain resolute in continuously evaluating and evolving our approach to ensure that modern slavery is prevented within our value chain. We are committed to advancing our approach by working in collaboration with all our stakeholders who share our commitment and sharing best practice in areas of strength so that others can also advance on their commitments.

To contact us about our commitment to addressing modern slavery, please email:

corporate.responsibility@severntrent.co.uk



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