



## **Pennon Group Statement on Anti-Slavery and Human Trafficking**

### **Where things stand today**

Pennon Group Plc is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing systems and controls to ensure modern slavery is not taking place anywhere within our own business or in any of our supply chain.

We have no tolerance to slavery or human trafficking. We expect all of those in our supply chain and contractors to comply with our values. Where possible we prefer to build long standing relationships with our suppliers and we make clear our expectations of business behaviour.

We operate strict procurement processes, ensuring suppliers adhere to clearly defined policies of sustainability and ethical working practices. We expect all our entities to have suitable anti-slavery and human trafficking policies and processes within their businesses and to cascade those policies to their suppliers.

Prior to contracting we carry out risk assessments which are designed to establish and assess areas of potential risk within our supply chains.

We include appropriate terms in our contractual documentation, standard terms and conditions and supplier code of conduct which require third party contractors to comply with the Modern Slavery Act 2015.

Throughout the life cycle of our contracts we reserve the right to conduct audits on our supplier contracts.

Through our training programmes and monitoring of suppliers, staff are encouraged to identify and report any potential breaches of the Group's anti-slavery and human trafficking policy.

Within our business, we use agency labour which is procured through key third party providers. The providers are responsible for vetting all agency staff and ensuring that they adhere to all legal requirements to protect works from poor treatment and exploitation.

We will assess any instances of non-compliance on a case-by-case basis and tailor any remedial action appropriately. We will only trade with those who fully comply with this statement or those who are taking verifiable steps towards compliance.

### **Where we're heading**

We are committed to raising the bar to combat the risks of modern slavery and human trafficking in every area of our business. We recognise that some areas of our operations, such as the use of agency labour, may be more susceptible to human trafficking and slavery and are working closely with providers to verify their existing processes and to develop our own risk assessment and rigorous monitoring program.


We are committed to driving high standards across the organisation and during the year have invested in the development of a Group Code of Conduct, which sets out the principles that we as a

company believe should guide our actions. All of our workforce, permanent and temporary, will receive training to ensure that they understand and are committed to upholding the principles in the Code.

In addition, we expect that all of our suppliers and contractors comply with equivalent principles set out in our Code.

This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes the Pennon Group's anti-slavery and human trafficking statement for the financial year 2017/18.

The statement was approved by the Pennon Group Board on 19 May 2017.



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C Loughlin  
Group Chief Executive  
Pennon Group Plc