
Scottish Water Business Stream Limited Slavery and Human Trafficking Statement

1. Introduction

Business Stream is committed to working in a responsible and sustainable way that serves the long-term interests of our customers, colleagues, suppliers, the communities we serve, and society more widely. We undertake to procure goods and services in a sustainable and ethical way in compliance with our values, public procurement law and policy, and the Modern Slavery Act 2015.

We are committed to sharing our values with our suppliers and potential suppliers and ensuring they understand how important these values are to us as an organisation, and the important role they play in demonstrating those values in the delivery of the services they provide for and with us.

This statement is designed to inform our customers, colleagues, business partners, suppliers and the general public about the steps Business Stream has taken, and is taking, to ensure that slavery and human trafficking are not present either in our business or in our supply chain.

Business Stream adopts a zero-tolerance approach to modern slavery and human trafficking. We are committed to respecting human rights, including the rights of children. Our zero tolerance principles are built into our contracts and tenders and reflected in the conversations we have, and the opportunities we promote, with our suppliers, contractors and sub-contractors. We review our procurement processes regularly to ensure responsible and sustainable sourcing. We expect all those who work for and with us to adhere to our zero-tolerance approach to slavery and human trafficking.

We recognise that modern slavery risks can be hidden and may exist beyond our direct contractual relationships. We therefore take a proactive, risk-based approach to identifying, preventing and addressing the risk of slavery, human trafficking, forced labour and labour exploitation within our organisation and across our supply chain. This includes embedding ethical sourcing expectations into our procurement activity, supplier onboarding, contract management and ongoing supplier engagement.

Business Stream is committed to transparency in its supply chain and to protecting against the risk that internal procedures, processes and contracts make demands of suppliers, contractors and subcontractors that may lead them to violate human rights.

Since the Modern Slavery Act 2015 came into force we have:

- Sought external legal advice to ensure that we are taking the necessary steps to support compliance.
- Held discussions with our Procurement and People and Development teams to support compliance.
- Created a Modern Slavery Policy, which has been approved by our Board of Directors.
- Assigned compliance roles and responsibilities within the business.
- Reviewed our existing suppliers' due diligence processes to support compliance with our Modern Slavery Policy.
- Identified Key Performance Indicators to assess our progress against our stated objectives.
- Introduced a continuous improvement approach to enhance our understanding of our wider supply chain so we are better placed to identify any risks.
- Become an accredited Real Living Wage employer, achieving accreditation in December 2017.

2. Our business

Business Stream is one of the largest B2B providers of water and waste water services in the UK, providing both licensed services (water and waste water) and unlicensed services (value-added services) to non-household customers.

Further information about our business, organisational structure and supply chain can be found at:

<http://www.business-stream.co.uk>

3. Organisational policies

Business Stream has a number of policies in place to guard against the risks of slavery, human trafficking, forced and bonded labour and labour rights violations. These policies include our:

- Modern Slavery Policy
- Procurement Policy
- Recruitment Policy
- Induction Policy
- Whistleblowing Policy

Our Modern Slavery Policy sets out our zero-tolerance approach to slavery and human trafficking and reinforces our commitment to acting in a transparent and ethical manner. It applies to all colleagues and external contractors working for or on our behalf.

The policy sets out roles and responsibilities within our business, identifies key risks and explains our risk management processes.

4. Supply chain due diligence

Business Stream's supply chain is designated by category and includes the following:

- Metering & Bill Production Services
- ICT Equipment & Services
- Marketing Services
- Facilities
- Corporate Services
- Business Solutions

Since the Modern Slavery Act came into force in 2015, Business Stream has progressively strengthened its approach to supply chain due diligence. Early activity focused on establishing the foundations for compliance, including seeking external advice, creating our Modern Slavery Policy, assigning internal responsibilities, obtaining supplier confirmations and recording supplier compliance through a supplier database.

From 2022 to 2025, our approach continued to mature, with policy updates, annual supplier compliance confirmations, the introduction and embedding of the Supplier Code of Conduct, enhanced supplier risk reviews, increased audit and assurance activity, and modern slavery requirements being built into tendering and contract management. More recently, we have expanded onsite supplier audits, used supplier reviews and action plans to monitor compliance and improvements, and continued targeted training for colleagues involved in procurement, supplier management and operational supplier engagement. Together, these actions demonstrate a clear progression from establishing compliance controls to a more active programme of risk-based monitoring, assurance and supplier engagement.

In 2025/26, we further strengthened our approach by continuing to embed modern slavery considerations throughout the supplier lifecycle, including sourcing, tendering, onboarding, contract award, supplier relationship management and periodic review. We reviewed supplier risk across key categories, with a particular focus on labour-intensive services, outsourced services, facilities, customer contact services, ICT support and other areas where extended supply chains may increase risk. For key and higher-risk suppliers, we used supplier reviews, audits and action plans to assess compliance, discuss concerns and monitor progress where improvements were required. Our supplier audits and assurance activity include consideration of labour rights, working practices, recruitment practices, use of subcontractors, right-to-work processes, grievance mechanisms, whistleblowing routes and evidence of supplier controls. Where reviews identify gaps or development areas, we work with suppliers to agree corrective actions and monitor completion through our supplier management framework.

We are also committed to aligning our policies and processes with internationally recognised best practice frameworks, as well as measuring and assessing our progress. In 2024, we became a signatory to the United Nations (UN) Global Compact, reinforcing our public commitment to its ten principles, which includes human rights and labour. In addition, we undertook our annual EcoVadis assessment in December 2025, earning a Gold rating (83/100). This assessment benchmarks our commitment to responsible and sustainable business practices across four key areas including labour and human rights, sustainable procurement and ethics.

Future supply chain

Our procurement process for re-tendering includes a dedicated section with additional questions in relation to slavery, human trafficking and transparency within our supply chain. Potential suppliers are required to demonstrate their ongoing commitment to preventing slavery and human trafficking in their organisation and extended supply chain for the duration of any contractual agreement. For relevant tenders, suppliers must demonstrate suitable governance arrangements, due diligence processes, training and oversight of subcontractors. Where a supplier cannot demonstrate appropriate controls, this may affect their ability to participate in, or be successful through, our tender process.

5. Training

Our Modern Slavery Policy is published on our company's intranet site. All colleagues are required to read and confirm their understanding of the content of the Modern Slavery Policy. During 2025/26, we continued to provide awareness training to colleagues involved in procurement, supplier management and operational supplier engagement. This training focused on recognising potential indicators of modern slavery, understanding routes for escalation, applying procurement and supplier due diligence processes, and ensuring colleagues understand the importance of challenging and reporting concerns. We provide further tailored training where it is necessary to do

so, for example where a policy breach has occurred or where a role carries increased supplier management responsibility.

6. Key Performance Indicators (KPIs)

Our procurement team ensure that the fundamental principles of Business Stream's Modern Slavery Policy and the Modern Slavery Act 2015 are embedded into sourcing activity, supplier onboarding, contract award, supplier reviews and ongoing supplier management.

The procurement team continues to build and maintain transparent and open relationships with current and future suppliers to help ensure that slavery and human trafficking are not occurring within their organisation or extended supply chain.

We use the following KPIs to measure how effective we have been in contributing to the elimination of slavery and human trafficking:

- Risk measurement across the supply chain, including identification of suppliers and categories that may present higher modern slavery or labour exploitation risks.
- Percentage of active suppliers who have confirmed compliance with Business Stream's Modern Slavery Policy, Supplier Code of Conduct and the principles of the Modern Slavery Act 2015.
- Number of supplier audits, assurance reviews or site visits completed, with a focus on medium and higher-risk suppliers.
- Percentage of relevant colleagues confirming that they have read and understood our Modern Slavery Policy.
- Percentage of relevant colleagues completing modern slavery awareness training.
- Ensuring that any policy breaches are reported internally within 3 business days of occurring.
- Ensuring that policy breaches are assessed within a week of being reported and further investigations are concluded as soon as possible thereafter.

7. Further steps

- Further develop our supplier risk assessment process to better identify modern slavery, forced labour and labour exploitation risks across our supply chain.
- Continue targeted audits, assurance reviews and supplier site visits for medium and higher-risk suppliers, both prior to contract award and periodically during the engagement.
- Continue to request annual re-confirmation of suppliers' ongoing commitment to guard against slavery and human trafficking in their organisation and across their supply chain.
- Issue and monitor supplier action plans where development is required, using our supplier management framework to track completion.
- Review our Supplier Code of Conduct and supplier due diligence questions to ensure they remain aligned with recognised good practice.
- Continue to ensure that our Employee Assistance Programme and Whistleblowing Policy and confidential phone line are highlighted and easily accessible to all our colleagues.
- Continue with awareness training across the organisation in 2026/27, with particular focus on procurement, contract management and operational colleagues who engage directly with suppliers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Business Stream's slavery and human trafficking statement for the financial year ending 31 March 2026.

This statement was approved by the Board of Directors on 24th September 2026 and signed by Johanna Dow, CEO, on behalf of Business Stream



Johanna Dow
Chief Executive
Scottish Water Business Stream Limited

Date: 24th September 2026