

CAW is committed to preventing modern slavery and human trafficking in every part of its business and supply chain. We have a zero-tolerance approach to any form of slavery or human trafficking, either within our business or our Supply Chain. Any occurrence of non-compliance, either within our business or supply chain is or will be assessed on a case-by-case basis and appropriate action taken.

In accordance with the (UK) Modern Slavery Act 2015, CAW is required to prepare a slavery and human trafficking statement for each financial year. The statement sets out all potential modern slavery risks related to its business and the steps it has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its own business.

The Republic of Ireland has similar legislation, primarily the Criminal Law (Human Trafficking) Act 2008, as amended by (inter alia) the Criminal Law (Human Trafficking) (Amendment) Act 2013. CAW which is incorporated in the Republic of Ireland, is compliant with this legislation.

CAW is 100% owned subsidiary of the Anglian Water Group (AWG) based in the UK. We employ approximately 110 people throughout Ireland in our operations in Dublin, Waterford, Sligo and Belfast within the water and wastewater industry and being an AWG subsidiary, CAW's values and reputation are integrated with those of Anglian Water Services Limited in relation to Human Rights Disclosures as included in the Anglian Water Services Limited Annual Integrated Report (AIR).

CAW is an employer within Ireland and the UK only. As an equal-opportunities employer, CAW is committed to creating and ensuring a non-discriminatory and respectful working environment for all its staff. We carry out checks on all employees directly employed 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.

CAW provides training on the issues of slavery and human trafficking and CAW's Anti-Slavery and Human Trafficking Policy is presented to all our employees and partners on a periodic basis. Where required and appropriate to the business tasks being undertaken, additional training is provided to employees and partners specifically involved in ensuring compliance with this Policy.

This document is available on CAW's IMS

The (UK) Modern Slavery Act 2015 categorises offences of slavery, servitude and forced or compulsory labour and human trafficking. Although human trafficking often involves an international cross-border element it is also possible to be a victim of modern slavery within our own country. There are several broad categories of exploitation linked to human trafficking, including sexual exploitation, forced labour, domestic servitude, organ harvesting, child related crimes, forced marriage and illegal adoption.

We require all of the providers of goods and services ("Suppliers" and the "Supply Chain") to CAW demonstrate that they provide safe working conditions, treat workers with respect, act ethically, and comply with all applicable legal requirements. All new Suppliers must complete the CAW Approved Supplier Form (CAW-QA-FOR-76) and must provide a response to Section 5.0 of this Form in relation to Modern Slavery & Human Trafficking providing information about their anti-slavery policies and activities. In addition, all New Suppliers should be requested to provide a Sustainability Statement referencing its compliance with the UN Sustainability Development Goal 8.7 Modern Slavery, Trafficking and Child Labour. We do not enter into business with any organisation, in the UK, the Republic of Ireland, the European Union (EU) and wider global territories which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Whilst CAW considers that we and the majority of our Supply Chain are not in an industry with a high risk of modern-day slavery and human trafficking we recognise that our organisation can be exposed to a greater risk of modern slavery and human trafficking violations when dealing with suppliers of products and services who have operations and suppliers in other territories outside of the Republic of Ireland, the UK, the EU and wider global territories. Where CAW believes that a Supplier represents a possible exposure to a greater risk of modern slavery and human trafficking violations CAW will conduct further levels of due diligence checks at the Supplier selection stages to understand the potential risk of poor labour practices throughout the Suppliers supply chain beyond.

In this context CAW has developed and implements a risk-based approach to identify and review supply chains that fall within industries and/or countries that can carry a higher risk of modern-day slavery and human trafficking.

CAW has developed the following measures to review and manage this area of risk:

- Responsible purchasing policy.
- Supplier code of conduct.
- Risk analysis framework of our Supply Chain.

SLAVERY AND HUMAN TRAFFICKING STATEMENT



This document is available on CAW's IMS

- Appropriate initial due diligence for and ongoing monitoring of Suppliers; and
- Commitment to collaborate closely with Suppliers to help them understand and work towards anti-slavery and human trafficking standards.

CAW's Whistleblowing Policy is communicated to employees via the staff handbook. The intention of the policy is to outline the process for employees to report instances of corruption, malpractice, and criminal behaviour including violations of the modern slavery and human trafficking company policy.

This statement is made in accordance with Section 54(1) of the (UK) Modern Slavery Act 2015 and constitutes CAW's Anti-Slavery and Human Trafficking Statement for the financial year ending 31st March 2024. It has been approved by the organisation's board of directors. This statement will be reviewed and updated for the next financial year ending 31st March 2025.

A handwritten signature in blue ink that reads 'Michael Cahill'.

Michael Cahill
Managing Director