

Modern Slavery Statement

Modern Slavery

Everflow takes its responsibility under the Modern Slavery Act 2015 extremely seriously and is a certified Living Wage Employer. To date, no instances of modern slavery have been raised within our business or supply chains and we are committed to taking the appropriate steps to ensure there are no instances of modern slavery within our business and supply chains going forward.

This statement is made on behalf of Everflow and its subsidiaries pursuant to section 54 (1) of the Modern Slavery Act 2015 (the Act) and constitutes the company's slavery and human trafficking statement for the period until 31st March 2023. Everflow recognises that modern slavery and human trafficking are significant issues presenting a challenge for businesses. We are committed to improving our practices to combat slavery and human trafficking.

We take a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in our business dealings. Everflow is a utility company serving business customers in the UK. It employs approximately 170 people, all based in the UK, with over 99% of its supply chain also based and operating in the UK.

Our policies on slavery and human trafficking

To reflect our commitment to acting ethically and with integrity in all our business relationships, minimising the risk of modern slavery, we have established the following policies:

- Slavery and Trafficking Policy
- Anti-bribery Policy
- Whistleblowing Policy
- Supplier Code of Conduct

We are also dedicated to implementing and enforcing effective systems and controls to prevent slavery and human trafficking from taking place.

Employment practices

We rigorously check all our employees have the right to work in the United Kingdom and are paid at or above the National Living Wage. We work with our supply chain to ensure similar checks are carried out in relation to temporary and agency workers.

In addition to the employment rights and benefits which are provided to employees, our Contracts of Employment and Company policies make clear to all employees what actions and behaviours are expected of our people. All employees who are involved in procurement activities are given annual training on modern slavery to ensure that procurement activities and decisions include consideration of these issues.

Our supply chain

Our supply chain includes providers of:

- Water and wastewater services
- Waste collection services
- Business-critical internal services such as equipment, IT, and software programmes
- Customer-facing services such as meter readers, water efficiency experts, and other value-added service providers
- Customer engagement services such as field sales agents, brokers, and third-party intermediaries.

Due-diligence process for slavery and human trafficking

We undertake a risk-based review of our supply chain to highlight any areas where we believe there is a heightened risk of slavery and human trafficking. As we operate solely in the UK and over 99% of our suppliers are UK-based, we consider our business activities to be low risk.

To date, no instances of modern slavery have been raised within our business or supply chains and we are committed to taking the appropriate steps to ensure there are no instances of modern slavery within our business and supply chains going forward.

We do not currently report on key performance indicators surrounding slavery and human trafficking. This is considered appropriate in light of the company's size and the risk assessment of our supply chain. This is considered annually for any indications that these should be introduced and tracked. We have also reviewed our existing key performance indicators for any indications that these would encourage behaviours associated with modern slavery or human trafficking, and have not identified this to be the case.

Reporting concerns regarding slavery or human trafficking

We foster a culture where our people are encouraged to raise concerns about unlawful, unacceptable practices or misconduct and can do so safely without fear of reprisal. We offer our full support to those who raise a concern in good faith. Individuals can confidentially and anonymously report a concern to our HR department.

Our Whistleblowing Policy ensures our people know how to raise concerns about any unethical practices within our business and supply chain without fear of recrimination.



James Cleave
Chief Financial Officer

Everflow Holdings and its subsidiaries, Everflow Limited, Everflow Tech Limited and Everflow Operations Limited

14 February 2023