

MODERN SLAVERY STATEMENT

2026





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INTRODUCTION

Modern slavery is one of the most critical human rights issues of our time. Millions of people are impacted globally, and it's not someone else's problem to solve – it's ours.

At Veolia, we operate across five continents with 215,000 people. We work with suppliers, contractors, and partners across complex global supply chains. That scale brings responsibility.

How We Approach This

How we grow matters as much as what we deliver. Our GreenUp strategy isn't just about environmental security. It's about ethical business practices and respect for human dignity.

You can't claim to be building a sustainable future if you're doing it on the back of exploitation. So we take this seriously. We proactively identify and address risks of modern slavery across our global regions. We engage actively with suppliers and subject-matter experts. We embed safety and compliance at the forefront of everything we do. Not because it looks good, but because it's the right thing to do.

Our Commitment

This Modern Slavery Statement outlines our progress, our challenges, and our commitments in combating modern slavery and is a genuine reflection of how seriously we take this responsibility.

In 2025, Veolia UK retained silver medal status with EcoVadis, with our score placing us in the top 7% of companies assessed for sustainability performance - across Environment, Labour & Human Rights, Ethics, and Sustainable Procurement. We're also a Supply Chain Sustainability School Gold Member, demonstrating our commitment through regular assessments, training, and active knowledge sharing.

We're committed to achieving our ambitions with integrity and ethics. To protect people at all times. Across our supply chains. Across our operations. Across everything we do.

The Bigger Picture

This statement reflects our continued efforts to uphold the highest standards of corporate responsibility, to ensure that business success goes hand in hand with social and environmental responsibility.



RICHARD KIRKMAN

Chief Executive Officer, Veolia UK & Ireland
Senior Executive Vice-President, Veolia Northern Europe
16 June 2026



1. SCOPE

This statement has been published in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking statement. Following Home Office guidance, our statement details the measures implemented by Veolia UK during the twelve months to 31 December 2025 to improve our ability to prevent and identify modern slavery in our operations and supply chain.

The statement was approved by our principal UK holding company boards at a joint meeting held on 16 June 2026 in their capacity as the direct or indirect parent companies of all entities listed below.

Throughout this statement, references to “Veolia” and “Veolia UK” refer collectively to Veolia ES Holdings (UK) Limited, Veolia Water UK Limited, and Veolia Energy UK Limited, together with their respective UK subsidiaries.

This includes, but is not limited to, the subsidiaries identified below:

Veolia Energy & Utility Services UK Limited

Veolia Water Outsourcing Limited

Veolia ES (UK) Limited

Veolia Environmental Services Group (UK) Limited

Veolia ES Staffordshire Limited

Veolia ES South Downs Limited

Veolia ES Shropshire Limited

Veolia ES Sheffield Limited

Veolia ES Landfill Limited

Veolia ES Hampshire Limited

Veolia ES Birmingham Limited

Veolia ES Nottinghamshire Limited

Veolia ES Southwark Limited

Veolia ES Merseyside & Halton Limited

Hampshire Waste Services Limited

South Downs Waste Services Limited

Sheffield Environmental Services Limited

Stirling Water Seafield Limited

Throughout this statement, we refer to our UK operations, processes, and procedures. However, due to the integrated nature of our UK and Ireland operations, all of our UK and Irish entities adopt and implement the unified standards, policies, and procedures to proactively prevent and identify modern slavery in their operations and supply chains.

These entities benefit from centralised support functions encompassing supply chain management, human resources, compliance, risk and assurance, and sustainability.

2. ABOUT VEOLIA

Veolia's global mission is to become the benchmark company for ecological transformation.

Our mission is underpinned by three key pillars:



Depollution



Decarbonisation



Regenerating Resources

Through the Group's 2024-27 GreenUp Strategy, we are actively working to reduce environmental impact, recover resources and build resilience into our operations and the communities we serve.



WATER MANAGEMENT

Providing drinking water and wastewater treatment services to millions of people worldwide.



WASTE MANAGEMENT

Collecting, processing, and recycling waste to promote a circular economy.



ENERGY SERVICES

Optimising energy use and providing low-carbon energy solutions.

WHO WE ARE & WHAT WE DO

14,700+

employees across the UK

400+

operational sites throughout the UK

50

Local Authority Partners

700+

industrial, water, and energy customers

2,000+

non-hazardous and hazardous waste treatment customers

85,000+

commercial waste customers

Net Zero

commitment by 2050

Over 340 million

waste collections per year

2,031,716 MWh

of renewable and recovered energy produced in 2025

195 million m³

of wastewater treated in 2025

In our Veolia UK operations, we recognise our exposure to modern slavery.

Our organisational risk assessments identify contingent labour usage as one of the areas where modern slavery risk is high, particularly for lower-skilled roles, with some geographical areas being more exposed than others. The use of contractors and subcontractors is also identified as a key risk area, along with certain categories of supply, including workwear and solar panels.

Steps taken to manage the risks

In our contingent labour usage, we recognise the importance of engagement and transparency, and we take the following steps.

- Working alongside our contingent labour provider to review and rationalise our approved supplier panel
- Holding joint quarterly business reviews to assess performance and compliance, including the effectiveness of our RTW and ID checking processes, worker voice survey, and worker onboarding
- Working closely on continual improvement projects.

Our contractors and suppliers are on-boarded using a third party assessment tool, and we operate an audit program, with external audit partners, for those falling into our higher risk categories.



Our Ethical Trade Audit program focuses on higher-risk suppliers, contractors, overseas material processing mills, and Veolia sites. For our UK operations, we complete multiple self-assessment questionnaires and publish our scores via membership platforms, including Sedex and EcoVadis. We also complete the Government's Modern Slavery Assessment Tool. All audit recommendations are followed up with tracked remediation plans, and we actively seek to continually improve all self-assessment scores.

Our annual supply chain risk analysis includes a modern slavery risk assessment, as outlined in Section 4.1.



3. GOVERNANCE & POLICY

3.1 Leadership

Our Executive Committee provides strategic leadership, rapid decision-making, and operational oversight between board meetings. The Executive Committee meets regularly and is assisted by several specialist committees and groups focusing on important topics, including the Modern Slavery Executive Subcommittee and the Modern Slavery Working Group (“MSWG”).

The MSWG comprises representatives from HR, Supply Chain, Operations, Legal, Compliance, and Sustainability. The Chief Compliance Officer serves as the Modern Slavery Lead. The MSWG completes risk mapping to aid the identification and prevention of modern slavery in Veolia’s operations and supply chain. Our risk mapping is produced collaboratively through cross-functional engagement and the use of external data, including the Global Slavery Index and reports published by specialist organisations. The working group implements and drives resulting action plans.



Standards are maintained through key performance indicators, ensuring policy, procedures, reporting mechanisms, training, and awareness remain current, relevant, and accessible. Action plan progress and KPIs are shared with Executive Committee members through the Modern Slavery Executive Subcommittee.

In 2025, the MSWG met on five occasions, with individual members meeting more frequently to drive specific projects and initiatives.

The MSWG reports to the UK Modern Slavery Executive Sub-committee, comprising the Chief HR Officer, the Chief Legal Officer, the Chief Compliance Officer, and the Chief Operating Officer for UK Treatment Operations. The MSWG convenes with the Executive Sub-committee biannually.

3.2. Policy

Our Modern Slavery and Human Trafficking Policy and Procedure outlines our commitment to the prevention and identification of modern slavery in our UK operations and supply chain. Our Supplier Charter outlines our commitment to ethical and sustainable procurement practices. These documents are published on our Veolia UK website.

Common standards, policies, and practices are adopted and implemented throughout our UK and Ireland operations, in accordance with the Veolia Group's Essential Rules and our Veolia Group Ethics Guide, which are well communicated throughout Veolia.

Our Human Rights Policy reinforces our commitment to, and compliance with, laws concerning human rights, workers' rights, workplace discrimination, and modern slavery, guided by the principles set out in the United Nations Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.

Our Whistleblowing Policy and Procedure is communicated to all employees. Confidential whistleblowing channels, including a telephone line and a digital platform, are permanently shared via our intranet, website, and site posters, which are visible

to all employees and third parties. The confidential reporting mechanisms are independently operated by external organisations and supported by a clearly defined reporting and investigation process for managing all alerts.

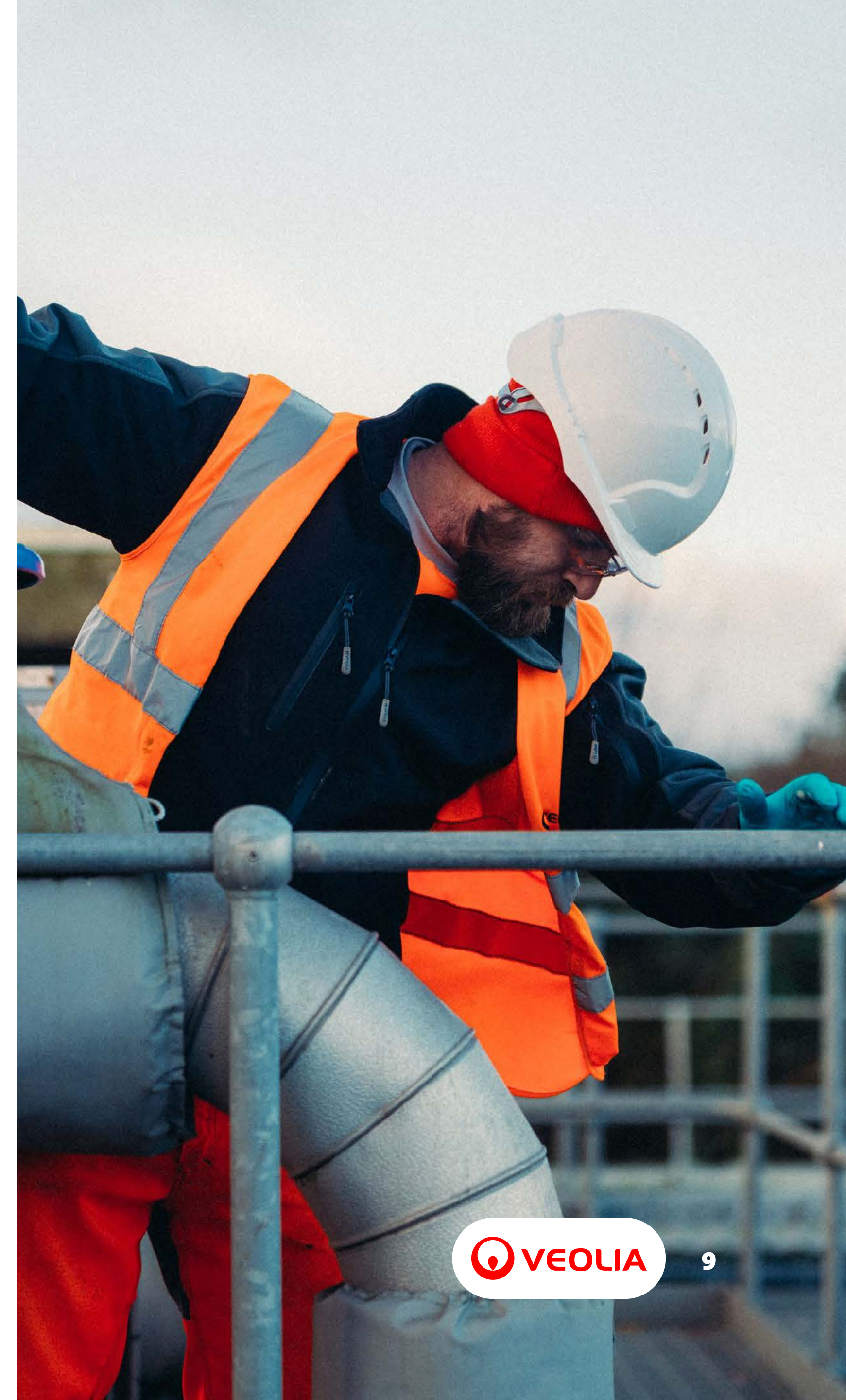
We also offer an Employee Assistance Programme that provides employees with access to confidential advice and information on a range of topics.

Our policies are published in English. The MSWG, in collaboration with relevant subject matter experts, is responsible for the development, implementation, and compliance with these policies.

3.3 Measuring Effectiveness

The Veolia Group's multi-faceted performance framework focuses on 15 audited indicators aligned with the United Nations Sustainable Development Goals. These indicators include measuring the impact of our contribution to society and our adherence to ethical standards. The indicators are underpinned by the Veolia Group's 2024-27 GreenUp strategy, purpose, mission, and values.

The MSWG monitors key performance indicators, including engagement, training, awareness initiatives, self-assessment scores, and alerts. These indicators serve to measure our standards and their effectiveness.



4. SUPPLY CHAIN

In 2025, Veolia spent £1.3 billion with 6,248 suppliers in 22 different countries. Over 93.3% of expenditure was in the UK. The modern slavery and human trafficking risks for each of the 22 countries were assessed using reputable sources before entering into trading relationships.

4.1 Supply Chain Risk

We recognise that the volume and complexity of suppliers can present a higher risk of undetected modern slavery. To assess risks in our supply chain, our procurement function conducts an annual modern slavery risk assessment using the Global Slavery Index, taking into account supply origins, supply categories, and the level of organisational spend. This is incorporated into our modern slavery risk mapping, which drives our improvement plans.

Our business employs a large and diverse operational workforce, which includes contingent labour but excludes migrant workers. We understand that contingent labour usage holds inherent risk, and we continue to work closely with our selected contingent labour service provider to enhance processes. Our joint goal is to increase our ability to prevent and identify modern slavery and to protect all workers.

Further information is available in section 5.2. 

Where higher risks are identified, we conduct internal and external audits to support the identification and remediation of potential risks.

Veolia is committed to safe, ethical, and sustainable procurement.

4.2 Supply Categories

Our supplier categories are shown in **Table 1**. Each category falls under the responsibility of one of Veolia UK's National Supply Chain Category Managers, who report to the Supply Chain Director, Veolia UK and Ireland.

Table 1

CATEGORY	CATEGORY NAME	TYPICAL PRODUCTS / SERVICES IN THAT CATEGORY
1	Operating suppliers, materials, and equipment	Valves, tools, pipes and fittings, pumps, engines, electrical, safety, laboratory, building materials
2	Industrial, technical, and service subcontracting	Waste and treatment subcontracting, transport and logistics providers, civil engineering, facilities management, and lab services
3	Mobile equipment and motorised equipment	New vehicles and spare parts, onboard equipment, bins, and containers
4	Fuel, energy, and chemicals	Electricity, Gas, Acids, Alkalis, Polymers, Diesel, Fuel Additives
5	Intellectual services	Insurance, technical and general managed consultants, legal providers, recruitment consultants, marketing agencies
6	General Purchasing	Temporary labour, travel, office supplies and furniture, postage, and archiving
7	IT and telecommunications	IT hardware and software, mobile phone, and airtime

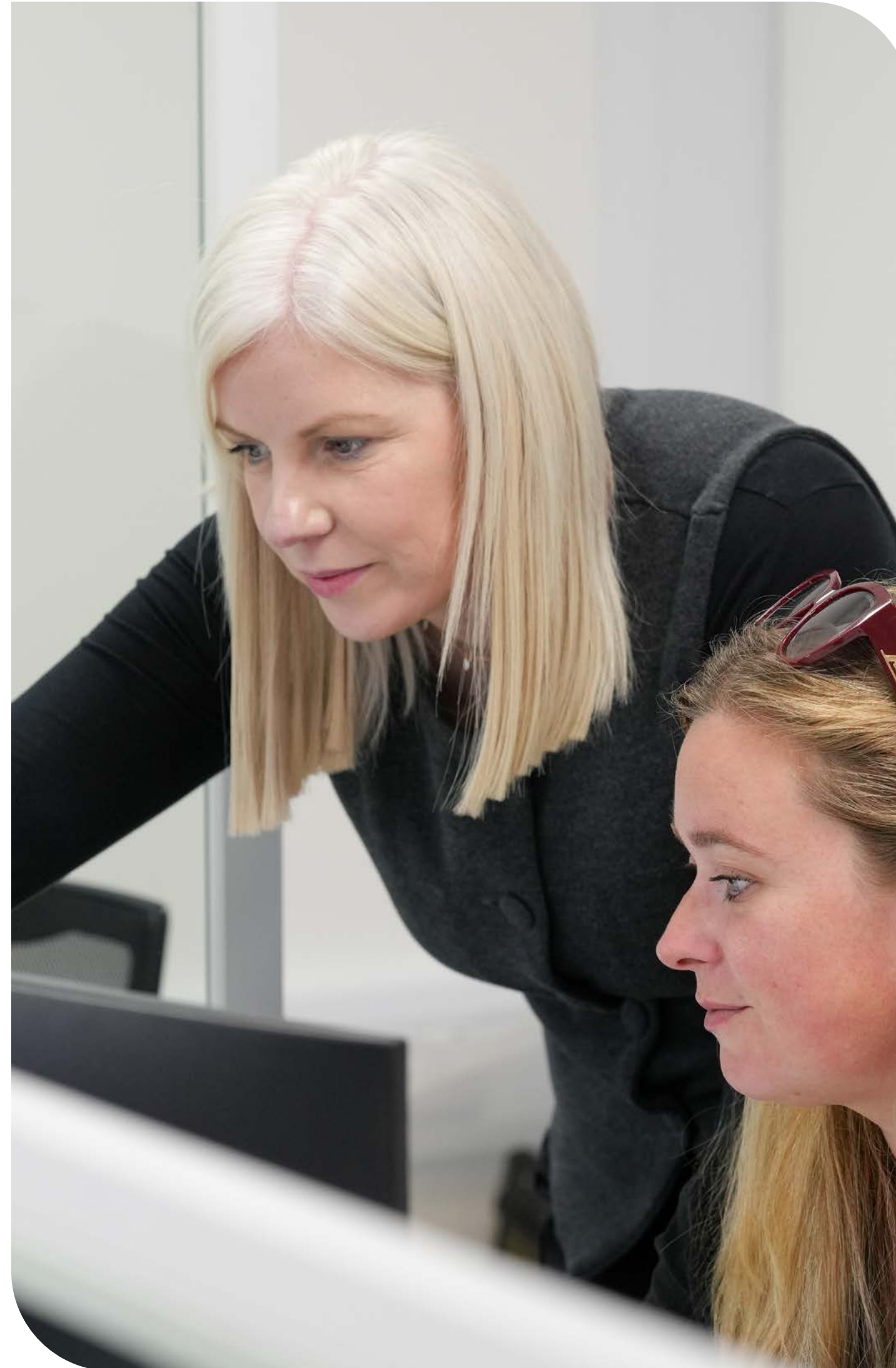
4.3 Supplier assessment

Before onboarding new suppliers, including subcontracted works providers, they must all complete our supplier assessment questionnaires in the SupplHi portal to assess their standards in health and safety, environmental impact, human rights (including modern slavery), and business ethics. A risk assessment for all new suppliers is also completed using Moody's Compliance Catalyst.

If standards are deemed inadequate, supplier applications undergo additional scrutiny in collaboration with appropriate Veolia subject matter experts. All suppliers are required to sign Veolia's Supplier Charter (published on the supplier information page of the Veolia UK website) to confirm their commitment to conducting business in alignment with Veolia's purpose and values. If suppliers fall short of the standards outlined in our Supplier Charter, Veolia adopts a collaborative approach to agree on improvement plans.

Suppliers who fail to comply with the UK Modern Slavery Act 2015 or decline to sign Veolia's Supplier Charter will be prohibited from conducting business with Veolia until they fulfil these requirements or actively collaborate with us to achieve compliance.

Veolia utilises the EcoVadis platform to evaluate labour and human rights standards for our key suppliers with a spend of >£4 million/year.



4.4 Supplier Terms and Conditions

Veolia employs several sets of standard terms and conditions for supplier transactions. These terms require suppliers to adhere to the UK Modern Slavery Act 2015 and grant Veolia the authority to conduct audits and request evidence demonstrating how suppliers mitigate modern slavery risk.

While Veolia is committed to supporting and collaborating with suppliers to address modern slavery risks, we reserve the right to terminate contracts as a final measure if necessary.

5. DIRECT & INDIRECT EMPLOYEES

5.1 Direct and TUPE employees

Veolia employs over 14,700 individuals in the UK on direct employment contracts. All employment contracts comply with UK legislation.

Wages are paid electronically and directly to employee bank accounts. Veolia will not onboard a new employee until Right to Work documentation has been received, reviewed, and validated against Home Office guidance. For new hires, documentation is collected through an electronic form on the HR and Payroll system. For employees transferring to Veolia under TUPE arrangements, Right to Work evidence is obtained within 21 days in line with Home Office guidance.

To reduce the risk of employee wages being directed to third parties, genuine cohabitation is verified, and the following checks are completed:

- Multiple employees with the same bank account
- More than two employees with the same address
- Clusters of employees within a specific postcode

We work with five Trade Unions to determine specific terms of employment for our employees covered by collective bargaining agreements. This may include pay, hours, leave, and health and safety policies. Veolia complies with the legislative requirements of the National Minimum Wage and the National Living Wage.



5.2 Indirect employees (contingent labour)

Veolia partners with a Contingent Labour Service Provider (“CLSP”) for temporary labour requirements. Our CLSP is contractually required to ensure they and their suppliers comply with the UK Modern Slavery Act 2015. We have a shared commitment to ethical labour practices and continuous improvement, and we work collaboratively to achieve this. The CLSP engages staff through a national agreement with a panel of approved agencies to provide contingent labour predominantly for frontline operational roles.

In 2025, 4,893 workers were supplied to Veolia under the CLSP arrangement. The CLSP has a Service Level Agreement with the panel agencies that requires them to comply with all applicable laws and regulations, including the UK Modern Slavery Act 2015. Their onboarding process ensures that all workers supplied to Veolia hold valid Right to Work documents, and retrospective documentation audits are also performed at Veolia sites.

We work closely with our CLSP to enhance processes to improve our ability to prevent and identify potential modern slavery. In 2025, a project was launched to introduce a second on-site digital right-to-work check via the use of a shared portal, which continues into 2026.

6. REMEDIATION

Veolia has established a modern slavery response framework to ensure thorough investigations prioritising victim safety and confidentiality.

While Veolia has not detected any cases of modern slavery, our documented process is designed to ensure a victim-centred approach. It provides for external support (counselling, safe accommodation, repatriation) and internal measures (redeployment, wage repayment, document restoration), with all actions to be formally documented. To prevent recurrence and mitigate risks, our Veolia teams proactively manage risk-driven improvement plans, which may include engaging suppliers to agree on best practices or corrective actions with clear timescales. Ongoing measures include regular audits, process and document review, staff and supplier training, collaboration with law enforcement and NGOs, and embedding human rights considerations throughout business operations to ensure long-term effectiveness.



7. TRAINING & AWARENESS

Veolia is committed to ensuring that all its employees, directors, and suppliers are informed about modern slavery, and they know how to spot the signs of modern slavery and safely report concerns.



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7.1 Executive Management

Senior-level awareness is raised through face-to-face engagement, including the MSWG twice yearly meeting with the Modern Slavery Executive Subcommittee, the Audit and Compliance Committee (held every four months and attended by Executive Committee members, including the Chief Executive Officer), and presentations to Senior Leadership teams made by the Chief Compliance Officer.

7.2 Managers, Supervisors, and their teams

Modern slavery eLearning is available to all staff. The eLearning module explains what modern slavery is, provides global and UK statistics, outlines business-specific risks, and provides guidance on how to spot the signs of modern slavery and report concerns safely. Completion is mandated for those working in areas of the business identified by our risk mapping as having greater exposure to modern slavery. Our eLearning is part of the induction process for all new employees, and is actively promoted to all staff annually as part of recognising Anti-Slavery Day on 18 October.

To recognise Anti-Slavery Day, a live virtual webinar is also delivered each year, for employees, in partnership with the Supply Chain Sustainability School.

7.3 Frontline operations

Our frontline briefing was relaunched in 2025. In 2026, operational managers will be required to ensure the briefing has been delivered to their frontline teams. The briefing shares a video of a victim's story and includes signposting to support, site posters, and policy and procedures.

7.4 Suppliers

As a Supply Chain Sustainability School Gold Member, Veolia collaborates with the school to assess risks and raise awareness. Our annual modern slavery supplier workshop offers guidance on how to achieve our ambition to continue to expand workshop attendance.

7.5 Posters

Two types of posters are displayed across our offices and operational sites. The first poster (spot the signs) is displayed in communal areas, while the second poster (how to seek support for victims) is displayed in private areas. Both posters provide guidance on raising concerns and accessing support.



8. THE VEOLIA UK JOURNEY & FUTURE PLANS

2015-2020

2021-2024

2025

2026

FOUNDATIONS & AWARENESS

- Modern Slavery Working Group established
- Modern Slavery Executive Subcommittee established
- eLearning launched to all staff
- Awareness posters designed & launched across all Veolia sites
- Annual Awareness Campaign established
- Gap Analysis conducted by Slave-Free Alliance
- Expansion of employee onboarding checks
- Implementation of policies and risk mapping

GROWTH & IMPLEMENTATION

- Performance & improvement metrics implemented
- Wider stakeholder engagement at increased frequency
- Ethical trade audits reviewed & implemented (overseas recycle facilities, contractors, high-risk suppliers, operational sites)
- UK Supplier Charter updated
- New ERP-integrated Supplier Assessment Portal launched
- Supplier training introduced via Supply Chain Sustainability School
- Targeted training program developed (frontline briefing video & mandated e-learning for higher-risk operations)
- Self-assessments completed on EcoVadis, Sedex & Government's Modern Slavery Assessment Tool
- Human Rights Policy implemented (human rights, workers' rights, discrimination & modern slavery)

REFRESH & REVIEW

- Continued rollout of third-party audit program
- Refresh & relaunch of frontline briefing video
- Review of site ID checks for contingent workers
- Pilot of digital ID checks for contingent workers

EXPANSION & FUTURE-PROOFING

- Expand mandated Modern Slavery e-learning target audience
- Expand digital ID checks for contingent workers
- Extend supplier due diligence to Tier 2 suppliers linked to high-risk Tier 1 suppliers
- Review & update MSWG Risk Mapping (aligned to current UK & global conditions)
- Implement Ethical Trade Audit Strategy for continued relevance
- Review & update Modern Slavery e-learning (ready for 2027 relaunch)



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