

# Modern Slavery Statement

For 12-months ending 31 March 2025

**electricity**  
north west



This statement sets out the steps that continue to be taken by the Electricity North West Group of Companies to mitigate the risk of modern slavery occurring within its operations and supply chain and, in doing so, to conform to the requirements of the Modern Slavery Act 2015. It covers the 12-month period from 1 April 2024 to 31 March 2025. Please refer to [Appendix 1](#) for the entities within the Electricity North West Group of Companies.

Modern slavery is a broad term covering instances where victims may be subject to conditions of slavery, servitude and forced or compulsory labour. Electricity North West is committed to identifying and addressing modern slavery, going beyond legal compliance.

We continue to review our policies and processes in this area, with a view to improving our understanding of the risks within our operations and supply chain and the mitigation we need to put in place to address the risks posed by modern slavery. In the year we have strengthened our approach to commercial assurance, with the establishment of a dedicated function, which further serves to mitigate the risk of modern slavery through increased supplier engagement and risk assessment activity.

Electricity North West is a long-standing member of Slave-Free Alliance (SFA), an international social enterprise, wholly owned by the global anti-slavery charity, Hope for Justice. SFA's mission is to help organisations of all sizes build their resilience against the risk of modern slavery in their operations and supply chain. Electricity North West is a founding member of the Utilities Against Slavery (UAS) working group which is coordinated by SFA. The working group meets monthly to develop collaboratively an industry focused approach on the issue of modern slavery and drive meaningful change within the sector.

The group has agreed on the following objectives:

- Develop a common understanding of the critical issues common to all members.
- Share best practices amongst the group's members.
- Identify and work collaboratively on jointly agreed strategic workstreams.
- Develop training materials to share with our supply chain and other stakeholders.
- Engage with other sectors to share good practices and identify common challenges.





Work that has been undertaken in the period 1 April 2024 to 31 March 2025 to meet the above objectives and future steps can be found in the attached link to the [UAS Chair's Annual Report](#).

Electricity North West's key interaction with the UAS in the year has been working with the UAS Chair to produce supplier assessment guidance following a pilot assessment conducted on one of Electricity North West's key suppliers.

**As outlined in our previous statement, we have also engaged with SFA to:**

- **Conduct a high-level modern slavery risk assessment of our top 50 suppliers.**
- **Develop our internal training materials to increase colleagues' awareness of modern slavery.**

As part of our ongoing commitment to work with the SFA and UAS, improving our approach to addressing the risks of modern slavery, SFA has previously conducted a gap analysis exercise to identify areas for improvement in the measures we have implemented. Key areas that we have continued to monitor in 2024/25 following on from the gap analysis assessment can be summarised as:

We have a training needs assessment for our people that was previously developed with the support of SFA. We have refined our training/communication for existing and new employees.

We continue to keep our key company policies/documents (e.g. whistleblowing policy) under review to ensure that they provide better reference and visibility to modern slavery, in line with good practice. Employees are encouraged to report modern slavery concerns under this policy.

We continue to promote awareness of modern slavery alongside other areas of customer vulnerability on our external website.

SFA provides guidance to help ENWL ensure that its modern slavery statement incorporates any newly mandated structure/content.

We continue to monitor and develop our procurement processes. Our focus has been to enhance our supplier due diligence processes to aid compliance with our commitment to prevent slavery or human trafficking being present in any part of our business. This has been helped by a restructure of the Procurement team in the year allowing an increased focus on mitigating the risk of modern slavery appearing within our supply chain.

As a customer-facing organisation, we recognise the importance of the part we play in helping to protect our communities and beyond from these abhorrent practices. To that end, our efforts to tackle modern slavery continue to form a key element of the company's Purpose-led Responsibility Framework which supports colleague-led community engagement, setting out how we work to deliver for our customers, particularly those who are vulnerable, and stakeholders. Our aspirations in addressing modern slavery go beyond legal compliance considerations. In line with our corporate purpose and principles, it is simply the right thing to do.

## 1. Our organisational structure and supply chain

**Electricity North West serves 5 million customers at 2.4 million domestic and industrial locations. It has approximately 2,300 employees, engages hundreds of suppliers, and provides a safe and reliable electricity supply, 24 hours a day, seven days a week.**

We own, invest in, operate and maintain the network of poles, wires, transformers and cables which carry electricity to and from homes and businesses across the North West. The company operates exclusively in the United Kingdom.

Our employees focus on delivering our core service of managing and maintaining the network, with contractors being used where it is a service that is widely available in the marketplace (e.g. excavation & backfill), ensuring efficient use of customers' money.

To support these work activities, we have a broad range of suppliers. Whilst most of these suppliers are UK-based, we have suppliers from countries deemed as 'higher' risk and previous gap analysis conducted by SFA identified extended tiers of subcontracting in construction and Personal Protective Equipment (clothing) as higher risk areas. Our current and developing due diligence measures are outlined below in section 3.

Overall accountability for our strategy to address the risk of modern slavery occurring within our supply chain sits with the Head of Commercial Services. Progress against this strategy is monitored as part of the quarterly Purpose-led Responsibility Framework steering group meetings, which has Executive sponsorship. This reinforces our aspirations to go beyond legal compliance in our approach to addressing modern slavery. The Procurement team has worked closely with the colleagues looking after other aspects of the Purpose-led Responsibility Framework, most notably Diversity and Inclusion, to facilitate round table discussions with a group of suppliers and share good practice. Diversity and inclusion have direct relevance to modern slavery. For example, marginalised groups or individuals can be vulnerable to exploitation or find it more difficult to report discrimination or other abuses.







## 2. Policies in place in relation to slavery and human trafficking

We are subject to a high level of regulation (e.g. Ofgem) given our public facing role and have a comprehensive set of policies and procedures that emphasise our commitment to the identification and prevention of unethical activities within our organisation, including the prevention of modern slavery. Key policies in relation to this area remain as follows:

<div>Modern Slavery Policy</div> <div></div>	<p>We are committed to acting ethically and with integrity in all our business dealings and relationships. This includes our commitment to identifying and addressing risks of modern slavery in all parts of our business.</p> <p>If we were to become aware that any of our suppliers had an issue relating to modern slavery, we would look to work proactively and collaboratively with that supplier to address the issue. We would review our rights to terminate the relevant contract(s) only as a last resort if, for example, the supplier did not seem to be taking the issue seriously. Our primary aim would be to try and address the issue head on, not simply walk away.</p>
<div>The Speak Up ("Whistleblowing") Policy</div> <div></div>	<p>Electricity North West seeks to ensure that any employee may voice concerns about incidents of wrongdoing, or other suspected malpractice, without fear of criticism or future discrimination. At Electricity North West we are proud of our strong commitment to high ethical standards in the way that we work. We support our employees to speak up when they see or believe there is wrongdoing in our workplace and our Whistleblowing Policy is in place to outline the procedure employees can use to raise their concerns. Although the aim of this policy is to provide an internal mechanism for reporting, we have in place a confidential, independent, external reporting line (including email) where employees can raise their concerns, should this be their preferred choice of communication. The policy contains clear reference to modern slavery.</p>
<div>Ethics in our Business Policy</div> <div></div>	<p>We understand the importance of operating with honesty and integrity in our business. We have captured this in a single ethics statement which applies to everyone who works for or on behalf of the business. We provide a supportive environment for colleagues to voice any concerns. Specific highlights of the policy include:</p> <ul style="list-style-type: none"><li>• Complying with relevant laws and regulations.</li><li>• Following procedures and policies.</li><li>• Zero tolerance for bribery and corruption.</li><li>• Acceptance of gifts and hospitality by exception only.</li></ul> <p>This policy is subject to Board review to ensure that it remains fit for purpose. The policy contains specific reference to our commitment that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Training is provided to everyone in the organisation with refresher sessions being run periodically. A training matrix has been created to ensure that modern slavery is appropriately covered for new and existing employees.</p>



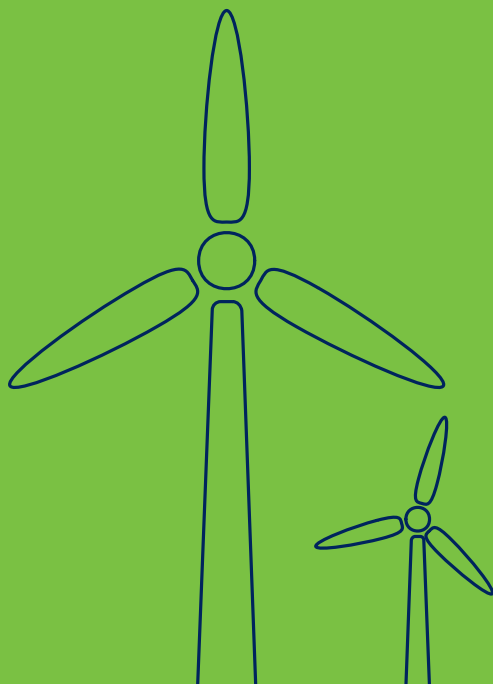
<div>Employment Screening Policy</div> <div></div>	<p>It is important that we also minimise the risk of modern slavery among the colleagues we employ directly. Although perceived as low risk, we carry our pre-employment checks across the business during recruitment, before or as employment starts.</p> <p>Once in employment, we also conduct checks to detect duplicate bank details and next of kin information/phone numbers to mitigate against the risk of a gang-master's information being provided. The screening process has been enhanced in the year as part of our efforts to ensure that we meet requirements of the Cyber Assessment Framework (CAF). The CAF provides a systematic and comprehensive approach to assessing the extent to which cyber risks (including physical security) are being managed by organisations responsible for vitally important services and activities. The higher level of scrutiny has also been applied to our supply chain, to meet our licence obligations relating to ensuring people working on our behalf are fit and proper and that Electricity North West treats its customers fairly.</p>
<div>Real Living Wage Employer</div> <div></div>	<p>Electricity North West values all our employees and we believe fair pay for a day's work creates a positive working environment for all our people.</p> <p>We continue to be a Real Living Wage Employer, and in addition to creating a more robust process to identify relevant suppliers, we commit to encourage these suppliers to pay the real living wage and to seek accreditation for their own organisations.</p>



### 3. Due diligence measures in place

Our due diligence procedures to assess our supply chain are proportionate to the risks of modern slavery and align with Electricity North West’s values and commitment to behave in an ethical manner. Our procedures can be summarised as follows:

- We have strengthened our due diligence measures in the year by purchasing Achilles Analytics, an all-in-one data intelligence tool designed to simplify the management and reporting of validated supplier data collected within the Achilles Utilities Vendor Data Base (UVDB). Use of Analytics allows us to track performance of key suppliers in their approach to addressing social issues such as modern slavery. For suppliers to the utilities industry, an audit service (Achilles Verify) is available that enables a supplier to demonstrate their capabilities to clients within the utilities sector. This service covers the procedures the supplier has in place to prevent slavery and human trafficking in its own organisation and supply chain. For the procurement of those contracts that are considered high risk, we are committed to reviewing the Achilles Verify audit reports where possible. If reports are not available, we will engage in discussion directly.
- Our Supply Chain Charter outlines the key principles of our policies on Modern Slavery, Business Ethics and Anti-Bribery and Corruption to those organisations that we contract with to make our stance on these matters clear. The Supply Chain Charter is now issued as part of all procurement engagement with suppliers who are required to confirm their acceptance of and compliance with the Charter. The Charter will be subject to review in the forthcoming year.
- We have in place a specific section for existing and potential suppliers on our external website which provides information regarding our procurement procedures. In addition, our Supply Chain Charter features prominently so that expectations of our suppliers are clearly communicated, including Modern Slavery.
- We continue to review our suppliers in terms of the level of business we do with them, whether they are based in ‘high’ risk areas of the world where slavery might be more prevalent and the product types they supply us with. See Section 4, ‘Risk Assessment’ opposite.
- We have built in enhanced coverage of the Modern Slavery Act to our tendering processes and require evidence of compliance from suppliers before awarding contracts.
- We continue to make clear our position on modern slavery and expectations from our suppliers by writing to our entire supplier base in April each year, reiterating our ethical expectations of our suppliers, specifically identifying Modern Slavery.
- We have worked with SFA to conduct a risk assessment of our top 50 suppliers. We have performed a desk top exercise to gather information available for those suppliers assessed as high risk and hold periodic briefing sessions with key suppliers to raise the visibility and awareness of modern slavery risks. This is through either meetings with individual suppliers or roundtable discussions.
- We ask our key suppliers to demonstrate to us the measures they have in place to prevent modern slavery arising in their own supply chains and we will continue to monitor this through periodic meetings and visits to our suppliers’ premises. As part of this, we look to conduct periodic assessments of key suppliers to check that the measures they have in place to mitigate the risk of modern slavery are working effectively. We will identify suppliers via periodic risk assessments conducted by SFA or through other work with the UAS Group.
- Our standard contractual terms require suppliers to comply strictly with the Modern Slavery Act and the UN Convention on the Rights of the Child.



### 4. Risk assessment and management

Our supply chain is risk assessed using the following criteria to assess and manage risk to workers:

- **Country risks:** Exposure may be greater in global supply chains in countries where protection against breaches of human rights is more limited than in the UK. We have a broad range of suppliers, many of whom procure their materials or components from such countries. We continually work with suppliers to gain a more detailed understanding of the impact on our supply chain, utilising reports such as the Global Slavery Index.
- **Product risks:** There are various risks in different product sectors. Certain industries, such as clothing manufacturing, are classified as ‘high’ risk and we risk assess across product categories.
- **Business partnership risk:** Our key contractual partners tend to be longer term and therefore involve less risk as we build up an in-depth knowledge of our partner’s operation and policies. However, we are not complacent with these partners and continue to work with them to understand how modern slavery risks are being managed, especially regarding subcontracted labour.

We have worked with SFA to review our risks across our supply chain and continue to review the mitigation that is in place to address these risks.





## 5. Key performance indicators

We have several KPI measures in place for supplier engagement and our internal training programme to help evaluate the effectiveness of the steps that we have put in place and demonstrate that we are making progress in our efforts to prevent modern slavery from existing in our supply chain.

Current KPIs focus on engagement, training events and leadership. For example, one KPI is ensuring that 100% of the Procurement team have received modern slavery training in the year. The KPIs were formulated following work co-ordinated by SFA through the Utilities Modern Slavery Working Group (now UAS Group). We continue to keep our KPIs under review and will follow good practice as identified through work performed with the UAS Group.



## 6. Training on modern slavery and trafficking

The company undertakes several measures to help raise awareness of modern slavery amongst our colleagues and suppliers and embed policy requirements which can be summarised as:

- Our corporate induction process which captures all new starters features a segment on Modern Slavery and is focused on helping our people to spot the signs of Modern Slavery and understand reporting options that are open to them.
- Our Modern Slavery policy and our Business Ethics policy are promoted to new and existing employees.
- The Procurement team has been trained in the year and company-wide communication initiatives have been undertaken. The company wide training focuses on spotting the signs of modern slavery when they are performing work within our communities. Such signs might be an unusually high number of people living in the same accommodation and particular behaviours that individuals might exhibit which might seem out of the ordinary to our operatives.
- Our employees are educated via periodic articles in our company bulletins (e.g. promoting Anti-Slavery Day, newsletter updates and e-Learning training).
- We have held periodic roundtable and briefing sessions with suppliers to raise the visibility and awareness of modern slavery risks, and the need for mitigation to be put in place.
- We are promoting awareness of modern slavery alongside other areas of customer vulnerability within a designated section of our external website.
- We will review our training materials with support from the SFA by 31 December 2025.
- Electricity North West continues to play our part in supporting UAS to address modern slavery risks and issues in the sector. The group (currently 14 utility companies) meets bi-monthly to share best practice, create co-ordinated risk management approaches and raise awareness of modern slavery, ultimately helping to prevent the exploitation of workers and others. Key training we have developed with the UAS Chair in the year relates to guidance for conducting supplier assessments.

The annual report for the UAS Group provides an overview of its purpose and objectives.





7. Continuous improvement

We strive to make incremental improvements to our approach to addressing the risks of modern slavery year on year.

We understand that we have a responsibility to our stakeholders, most importantly the customers we serve, to continue to assess and mitigate the risk of modern slavery. We will continue to remain vigilant and review our approach to ensure that we have appropriate mitigation in place for this risk. Should we identify any incidents related to modern slavery, we will look to collaborate with appropriate parties to address the root causes.

We will continue to work with the SFA in the coming year to review training materials for our employees and refresh our risk assessment for key suppliers within our supply chain, enhancing our approach to providing assurance that suppliers have appropriate measure in place to address the risk of modern slavery occurring in their supply chains.



**Ian Smyth**  
CEO and Statutory Board Director for North West Electricity Networks (UK) Limited

This statement has been approved by the North West Electricity Networks (UK) Limited Board on behalf of the Electricity North West Group of Companies listed in Appendix 1.

21 May 2025

Appendix 1

Electricity North West Group of Companies

Company Number	Registered Name
06428372	North West Electricity Networks (UK) Limited
06428374	North West Electricity Networks (Finance) Limited
06428534	North West Electricity Networks (Holdings) Limited
10445236	Electricity North West Services Limited
07382637	Electricity North West (Construction & Maintenance) Limited
08374655	NWEN Finance plc
06872880	NWEN Group Limited
06428375	North West Electricity Networks plc
06873051	ENW Capital Finance plc
06845434	ENW Finance plc
02366949*	Electricity North West Limited
06027314	Electricity North West Number 1 Company Limited
10929718	Electricity North West Property Limited
13464314	Electricity North East (Construction and Maintenance) Limited
12619404	CLASS Electricity Limited
14753711	Steel River Power Limited (50/50 JV with Steel River Energy Limited)
6383023	Electricity North West (ESPS) Pensions Trustees Limited

\*Only Electricity North West Limited has turnover above £36m and is required under the Modern Slavery Act 2015 to produce an annual modern slavery statement.

**Electricity North West Limited**

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