

## Anti-Slavery and Human Trafficking policy

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and suppliers. This statement sets out the steps taken by Adroit Utilities during to prevent modern slavery and human trafficking in its business and supply chains and this policy has been approved by the company Directors.

Adroit Utilities Ltd undertakes work throughout the United Kingdom and strictly prohibits the use of modern slavery and human trafficking in our operations and our supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

### Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

### Responsibilities

- The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The management team are responsible for compliance within their respective departments ensuring they understand and in their supplier relationships.
- All employees must ensure this policy is read, understood.
- All employees must comply with this policy.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

### Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection, and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.

Adroit Utilities Ltd, 3 Cedar Court, Halesfield 17, Telford TF7 4PF					
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- A pre-qualification questionnaire is sent to potential Sub-contractors to assess their modern slavery and Human trafficking arrangements.
- Adroit Utilities are accredited to and work in conjunction with Constructionline and Achilles supplier prequalification systems which address the issues of Modern Slavery and Human Trafficking within their audit acceptance processes.
- Continue to work and engage with our supply chain.
- Our Anti-Slavery Human Trafficking policy is communicated on company induction and in employee handbooks to all staff.
- Right To Work checks are undertaken for all members of staff.
- Additional training will be undertaken on the issue of modern slavery where appropriate.
- Our Anti-Slavery Human Trafficking policy is readily available across our business and displayed on our website – [www.adroitutilities.com](http://www.adroitutilities.com)
- You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the senior management team.

### **Risk-based approach**

We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach, we will also assess the merits of writing to suppliers requiring them to comply with our policy, which sets out the minimum standards required to combat modern slavery and trafficking.

### **Consistent with our risk-based approach we may require:**

- Employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our policies.
- Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to our policies.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our policies.

If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships.

### **Reporting suspicions of slavery**

You can report any suspicions of slavery either through our company's Whistleblowing policy or confidentially to the Modern slavery helpline (*Details set out below*):

**WEB:** [www.Modernslaveryhelpline.org](http://www.Modernslaveryhelpline.org)

**TEL:** 08000 121 700

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If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any area of our supply chain constitutes any of the various forms of modern slavery, raise it with your line manager or the compliance manager. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

**Breaches**

- Any employee who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This policy is endorsed by Senior management and signed on behalf of Adroit Utilities by

Name: Terence Gormley

Signature: *T Gormley*

Position: Director

Date: February 2025

Review Date: February 2026

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