



## INTEGRAL UTILITIES GROUP LTD HEALTH, SAFETY, ENVIRONMENTAL AND QUALITY



### MODERN SLAVERY POLICY STATEMENT

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This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Integral Utilities Group Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Integral Utilities Group Ltd. has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

#### **Our business**

Our business operates within the Energy and Utilities sector and as such utilises skilled labour to execute our operations as well as sub-contractors and number of suppliers.

#### **Our high-risk areas**

Skilled workers and labour required for the installation of gas network infrastructure are areas of the business that is considered to be high risk and as following our current processes and protocols, we assessed that there is currently a low overall risk of modern slavery and human rights abuses occurring in our own operations.

#### **Our policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

#### **Our suppliers**

Integral Utilities Group Ltd operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery and where possible will conduct on-site audits which will include a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to conform that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with suppliers, we require that they confirm to us that: for example:



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1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

### **Training**

We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

We monitor relevant performance indicators, for example

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

**Breandan Flynn, Chief Executive Officer**

*Breandan Flynn*

**Date: 27-07-2020**