



Author/Owner <i>(Job Title)</i>	Approved by <i>(Job Title)</i>	Date of Issue	Review Date
Head of HR	Board of Directors	20/07/2026	12 months after approval

Modern Slavery and Human Trafficking Policy

Business Area(s):

All Utility Aid

Purpose of Policy Statement

This policy sets down Utility Aid's commitment to preventing modern slavery and human trafficking in its business activities and supply chains. It combines the company's existing commitments with a more detailed description of the governance, risk assessment, due diligence, training and monitoring arrangements used to support that commitment.

Utility Aid has zero tolerance for slavery, servitude, forced or compulsory labour and human trafficking. Everyone working for or on behalf of the company has a duty to remain alert to risks, however small, to report concerns promptly and to cooperate with any investigation or remedial action.

This policy applies to all directors, employees, workers, agency workers, consultants and contractors, and sets out the standards expected of suppliers, subcontractors and other business partners. It also supports any modern slavery statement or tender response that Utility Aid is required or chooses to provide.

1. Organisational Structure, Business and Supply Chains

Utility Aid Limited is a private limited company registered in England and Wales (company number 04408718). Utility Aid provides energy and utility procurement and related support services, primarily to charities, not-for-profit organisations and other purpose-led customers.

The company currently operates in the following countries:

- United Kingdom
- Republic of Ireland

Utility Aid's own workforce is predominantly professional and office-based. Its supply chain may include:

- electricity, gas and water suppliers and other regulated market participants;
- metering, data collection, engineering, installation and other technical service providers;
- software, cloud hosting, telecommunications, cyber security, IT hardware and data service providers;
- professional advisers, recruitment agencies, training providers and other outsourced business services;
- facilities management, cleaning, security, maintenance, property, travel and logistics providers; and
- office equipment, stationery, branded merchandise and other goods and services used to support the business.

Utility Aid recognises that modern slavery risk can arise beyond its direct contractual counterparty, including through subcontracting, labour agencies, manufacturing, extraction, construction, transport and overseas sourcing.



Responsibility for the company's anti-slavery initiatives is as follows:

Name: Melissa Barrett

Title: Head of HR

Email: mbarrett@utility-aid.co.uk

The Board of Directors has overall responsibility for the company's approach. The Head of HR owns this policy and coordinates its implementation with relevant managers and business functions.

2. Policies and Standards

The company is committed to ensuring that there is no modern slavery or human trafficking in its business or supply chains. This policy affirms Utility Aid's intention to act ethically and with integrity in all business relationships.

Utility Aid prohibits slavery, servitude, forced or compulsory labour, human trafficking, debt bondage, deceptive recruitment, unlawful recruitment fees, retention of identity documents and any other form of severe labour exploitation.

This commitment is supported by Utility Aid's wider governance arrangements, including recruitment and employment procedures, right-to-work checks, equality and dignity-at-work arrangements, whistleblowing and grievance channels, disciplinary procedures, health and safety controls, supplier selection and contract management.

Utility Aid expects suppliers and business partners to:

- comply with all applicable modern slavery, human trafficking, employment and human rights laws;
- ensure that all work is freely chosen and that forced, bonded, trafficked or unlawful prison labour is not used;
- not charge workers unlawful recruitment fees or confiscate passports or identity documents;
- maintain lawful wages, working hours and safe working conditions;
- apply equivalent standards to their own suppliers and subcontractors;
- notify Utility Aid promptly of any actual or suspected modern slavery connected with work undertaken for Utility Aid; and
- cooperate with reasonable information requests, investigations, corrective action plans and audits.

3. Risk Assessment and Management

Utility Aid takes a proportionate, risk-based approach. The direct risk within its professional workforce is considered lower than in labour-intensive industries, but no organisation or supply chain is entirely without risk.

Risk is considered by reference to factors including:

- the nature of the goods or services being supplied;
- the country or location in which work is carried out or goods are produced;
- the use of migrant, temporary, agency, low-paid or irregular labour;
- the extent of subcontracting and the visibility and complexity of the supply chain;
- the value, criticality and duration of the supplier relationship; and
- credible adverse information, previous incidents or a supplier's willingness to provide evidence.

Areas of potentially higher risk within the wider supply chain may include:

- site-based engineering, metering, installation, construction and maintenance activities where subcontracted or temporary labour may be used;
- cleaning, security, logistics, hospitality and facilities services involving lower-paid, migrant or agency workers;
- IT hardware, electrical equipment, batteries, uniforms and promotional goods with global manufacturing or raw-material supply chains;



- energy generation, infrastructure, extraction and commodity supply chains operating in sectors or jurisdictions with weaker labour protections; and
- recruitment or labour-supply arrangements where workers may be exposed to fees, debt, document retention or deceptive terms.

Controls are scaled to the risk identified and may include additional evidence requests, contractual protections, management approval, enhanced due diligence, corrective action plans, monitoring, audit rights, suspension of work or termination where appropriate.

4. Supplier Due Diligence

The company undertakes due diligence when considering new suppliers and regularly reviews relevant existing suppliers. Utility Aid seeks to build long-standing, transparent relationships, make its expectations clear and evaluate modern slavery and human trafficking risks in a proportionate manner

Depending on the nature and level of risk, due diligence may include:

- screening and categorising suppliers according to the modern slavery risks associated with their sector, location, labour model and supply chain;
- requesting a modern slavery statement or policy, workforce and recruitment information, supply-chain details, certifications, audit reports or details of previous incidents;
- checking credible public information and adverse media where proportionate;
- including modern slavery obligations in tender documents, supplier terms or contracts, including notification, cooperation, information, remediation and termination provisions;
- requiring enhanced responses, management approval or further investigation where elevated risk or warning signs are identified; and
- periodically reviewing higher-risk or critical suppliers and reviewing any supplier when a material change or concern arises.

Where a supplier fails to meet the standards expected, Utility Aid may require a time-bound improvement or corrective action plan and monitor delivery. Sanctions may include suspension, removal from an approved supplier list or termination of the business relationship.

Where actual or suspected modern slavery is identified, Utility Aid will prioritise the safety and interests of affected workers, seek appropriate specialist or legal advice and avoid action that could place individuals at greater risk. Immediate termination will not be treated as the automatic response where it could worsen harm to workers.

5. Reporting Concerns and Protection from Retaliation

Staff members and others working for Utility Aid are expected to report any concern or suspicion of modern slavery promptly. Concerns may be raised with a line manager, the Head of HR or through the company's whistleblowing arrangements.

Concerns will be treated seriously and, so far as possible, confidentially. No person will suffer retaliation or detrimental treatment for raising a genuine concern in good faith, even where the concern is not substantiated.

Management is expected to act on concerns, preserve relevant information, obtain appropriate advice and



escalate matters to competent authorities where required. Where there is an immediate risk to life or safety, the emergency services should be contacted without delay.



6. Training and Capacity Building

To support a good understanding of modern slavery and human trafficking risks in the business and supply chains, Utility Aid communicates this policy and provides guidance on how to recognise and report concerns. Modern slavery awareness is included within induction and may be reinforced through periodic compliance communications or refresher training.

More detailed guidance or training will be provided, where proportionate, to employees involved in recruitment, supplier selection, contract management, compliance and the management of outsourced services.

Training and guidance may cover:

- the meaning and common forms of modern slavery and human trafficking;
- risk factors and warning signs in employment and supply chains;
- responsible recruitment and the risks associated with fees, debt and document retention;
- supplier risk assessment, due diligence and contractual controls;
- how to respond safely while protecting the welfare and confidentiality of potential victims; and
- Utility Aid's internal reporting and escalation routes.

Utility Aid may also provide suppliers with guidance, request evidence of relevant training or require corrective training and capacity building where this is a proportionate response to an identified risk.

7. Measuring Effectiveness

Utility Aid reviews the effectiveness of this policy and its supporting controls at least annually. The Head of HR will coordinate the review with relevant managers and report material findings or concerns to senior management and, where appropriate, the Board.

Proportionate performance indicators may include:

- completion of modern slavery awareness training by relevant employees;
- the number and proportion of relevant new suppliers risk-screened before appointment;
- the number of higher-risk or critical suppliers subject to enhanced due diligence or periodic review;
- the use of appropriate modern slavery provisions in relevant new or renewed contracts;
- the number and nature of concerns raised, investigations completed and outcomes recorded;
- the number and status of corrective action plans; and
- completion of the annual modern slavery risk and policy review.

Performance information will be used to identify gaps, set improvement priorities and update risk assessments, due diligence, training and supplier controls. An increase in reported concerns will not automatically be treated as evidence of deteriorating performance, as it may reflect improved awareness and reporting.



8. Breaches, Remediation and Enforcement

A breach of this policy by an employee may result in disciplinary action, up to and including dismissal, in accordance with applicable procedures. A breach by a supplier, contractor or business partner may result in corrective action, increased monitoring, suspension, termination or referral to relevant authorities, subject to contractual rights and the need to protect affected workers.



9. Review, Approval and Publication

This policy will be reviewed at least annually and sooner where there is a material change in legislation, government guidance, Utility Aid's operations, its supply chain or risk profile, or following a significant incident or control failure.

Where Utility Aid is required or chooses to publish an annual modern slavery statement, it will describe the steps actually taken during the relevant financial year and will be approved, signed and published in accordance with the applicable legal and governance requirements.

The approval and effective date fields at the beginning of this draft must be completed once the revised policy has been formally approved.

Version Control

Version	Date	Author	Change Details
0.1	30/01/2022	M Barrett	Document created
1.0	30/01/2022	M Barrett	Document issued
1.1	30/01/2023	M Barrett	No changes
1.2	26/07/2024	M Barrett	Issued via Atlas
Y-2.0	18/07/2025	C Dixon	New Version Control
X-2.1	19/02/2026	M Barrett	No change
X-2.2	20/07/2026	M Barrett	Expanded to cover structure, policies, risk, due diligence, training and effectiveness measures