



Modern Slavery and Human Trafficking Policy

This policy applies to the following statutory entities within Ipsum:

- Ipsum Group Limited
- Ipsum Utilities Limited
- Ipsum Water (England & Wales) Limited
- Ipsum Drainage Solutions Limited
- Ipsum Survey Solutions Limited
- Ipsum Infrastructure Limited
- Ipsum Drainage (Scotland) Limited
- Ipsum Power (Licensed Networks) Limited
- Ipsum Power (Private Networks) Limited
- Ipsum Power (North West) Limited

Document Overview			
Document Classification	Internal Use		
Purpose	Company policy statement relating to modern slavery and human trafficking and mitigation of the associated risks in our business.		
Document Name	Modern Slavery and Human Trafficking Policy		
Last Updated	25/03/2022		
Next Review Date	25/03/2023		
Original Author	Sophie Hammler		
Document History			
Version	Date	Detail of Amendments	Amended by
0.1	12/12/2020	Initial draft	Sophie Hammler
0.2	17/12/2020	Re-draft	Karen Harding
0.3	11/02/2021	Re-draft	Karen Harding
0.4	13/12/2021	Logo change	Hayley Parker
0.5	25/03/2022	Wording update on sub-contractors	Craig Howard
1.0	25/03/2022	Implementation of document	Amanda Clemas
Document Approval			
Role	Name	Signature	Date
Chief Executive Officer	Richard Thomas		1/4/22
Head of HR	Karen Harding		01/04/2022

Purpose

The purpose of this policy is to detail Ipsum's stance on Modern Slavery and Human Trafficking and mitigation of the associated risks in our business.

Introduction

Ipsum are a specialist provider of utility services operating on both public and private networks.

Our supply chain includes the supply of goods and materials as well as the use of subcontracted services and agency labour for the effective delivery of services in the water, power and infrastructure sectors.

Policy

The risks relating to modern slavery and human trafficking can occur anywhere in our operations, whether through direct employment, sub-contracting or the supply of goods, materials or services. The area of greatest risk is the importation of goods and materials from outside UK and EU and the level of management control required for these sources will be kept under review.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We will not support or deal with any business knowingly involved in modern slavery or human trafficking. We are committed to acting ethically and with integrity and to maintaining systems and controls within our business to prevent modern slavery and human trafficking from taking place either in our business or in our supply chains.

Consistent with our disclosure obligations under the Modern Slavery Act 2015, we are also committed to ensuring there is transparency in our own business and also throughout our supply chains.

This policy statement applies to all individuals or companies working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agencies and agency workers, seconded workers, volunteers, interns, agents, sub-contractors, external consultants, third-party representatives and business partners.

This policy statement does not form part of any employee's contract of employment, and we may amend it at any time.

As part of Ipsum's due diligence processes, we verify every new employee's right to work in the UK upon the commencement of their employment. Within our supply chain, we communicate our zero-tolerance approach to modern slavery at the outset of establishing any business relationship and our requirement from our suppliers

and sub-contractors to ensure there is no slavery or human trafficking in their supply chains. Where possible, we establish long-standing relationships with reputable suppliers and sub-contractors and require either that they have an anti-slavery and human trafficking policy of their own or, if they do not, that they agree to comply with ours.

As part of our sub-contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. If issues are identified, we will review our relationship and take appropriate action.

Over the next 12 months we will be undertaking Subcontractor Review Meetings relevant to our business activities and relationships with our supply chains and within these meetings we will assess the effectiveness of our due diligence processes and enhance these where necessary.

This policy statement is communicated to new employees upon the commencement of their employment. To enhance the level of understanding of the risks of modern slavery and human trafficking in our business and our supply chains, over the next 12 months we will be implementing further training activities and requiring the same of our suppliers and sub-contractors.

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 on our behalf. All parties are required to avoid engaging in any activity that might lead to, or suggest, a breach of this policy statement.

Anyone who has any concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains are expected to notify their line manager or a director as soon as possible.

A breach of this policy statement is taken extremely seriously and any potential breach by an employee will be fully investigated and dealt with under the Company Disciplinary Procedure which may result in disciplinary action up to and including dismissal.

If we find that individuals or companies working with us or on our behalf have breached this policy statement, we will ensure we take appropriate action which may include the termination of our relationship.

This statement is made and complies with section 54(1) of the UK Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement for Ipsum Group Limited for the financial year ended 31 December 2021.

A handwritten signature in black ink, appearing to read "Richard Thomas", written over a horizontal dashed line.

Richard Thomas
Chief Executive Officer
01/01/2022