

# Modern Slavery & Human Trafficking Policy

## Document Overview

<b>Document Classification</b>	Internal Use
<b>Scope</b>	This policy applies to all legal entities within Ipsium
<b>Purpose</b>	Company policy statement relating to modern slavery and human trafficking and mitigation of the associated risks in our business.
<b>Document Name</b>	Modern Slavery and Human Trafficking Policy
<b>Last Updated</b>	04/02/2025
<b>Next Review Date</b>	01/01/2026
<b>Original Author</b>	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	Working update on sub-contractors	Craig Howard
1.0	25/03/2022	Implementation of document	Amanda Clemas
2.0	23/05/2023	Annual review and update and implementation of updated document	Karen Harding
3.0	31/05/2024	Update to Scope of document. Annual review and update and implementation of updated document	Karen Harding
4.0	04/02/2025	Annual review and update and implementation of updated document	Sophie Hammler

## Document Approval

Role	Name	Signature	Date
Chief Executive Officer	Andrew Cowan		04/02/2025
HR Director	Karen Harding		04/02/2025



## Purpose

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

## Scope

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.

## Introduction

Ipsium 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

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.

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

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.

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.

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.

Over the past 12 months we have strengthened our subcontractor onboarding by implementing a single, standardised subcontractor onboarding process. This reflects our ongoing commitment to continuous improvement and enhances our due diligence processes relevant to our business activities and relationships with our supply chains.

As part of Ipsium's onboarding due diligence processes, we verify every new employee's right to work in the UK upon the commencement of their employment. Likewise, we require subcontractors to confirm that they conduct the same checks within their own recruitment processes.

This policy statement is communicated to new employees upon the commencement of their employment. Additionally, all employees are required to complete mandatory modern slavery e-learning annually to enhance the level of understanding of the risks of modern slavery and human trafficking in our business.

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 Policy and 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 the financial year ended 31 December 2024.

A handwritten signature in black ink, appearing to read "Andrew Cowan", with a long horizontal flourish extending to the right.

Andrew Cowan  
Chief Executive Officer

4 February 2025