



# Modern Slavery & Human Trafficking Policy

Document Overview			
Document Classification		Internal Use	
Scope		This policy applies to all legal entities within Ipsum	
Purpose		Company policy statement relating to modern slavery and human trafficking and mitigation of the associated risks in our business.	
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Document Approval			
Role	Name	Signature	Date
Chief Executive Officer	Andrew Cowan		06/01/2026
HR Director	Karen Harding		06/01/2026



## Purpose

The purpose of this policy is to detail Ipsum'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

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

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 require suppliers to confirm their compliance with the UK Modern Slavery Act 2015 and all other applicable laws relating to modern slavery and human trafficking. Through this requirement, the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children is strictly prohibited, and we expect that our suppliers will hold their own suppliers to the same high standards.

We operate standardised subcontractor and supplier onboarding processes across Ipsum. Newly acquired businesses are incorporated into these processes as part of post-acquisition integration, to support consistent application of the standards set out within this policy statement. 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 Ipsum's onboarding due diligence processes, we verify every new employee's right to work in the UK prior to the commencement of employment. An individual's nationality and immigration status are identified through the right to work checking process. For UK nationals with a valid passport, checks are conducted using a Home Office-compliant Identity Service Provider (IDSP). Where a UK passport is not available, we carry out manual checks of original documents in accordance with the Home Office's prescribed lists. For non-UK nationals, right to work is verified using the Home Office online right to work checking service.

These controls are applied consistently to all prospective and current employees and are designed to demonstrate compliance with Sections 15 to 25 of the Immigration, Asylum and Nationality Act 2006, in line with the Home Office's *Comprehensive Guidance for Employers on Preventing Illegal Working*. Copies of all documents and check results are retained securely for a minimum of two years after employment ends, in accordance with our data retention schedule.

Where an individual has a time-limited right to work in the UK, we carry out follow-up checks prior to expiry to confirm continued eligibility to work. Periodic re-checks are not required for individuals with an indefinite or permanent right to work.

We also require subcontractors, agencies and other third-party labour providers to confirm that they undertake appropriate right to work checks within their own recruitment and engagement processes and that all personnel supplied are eligible to work in the UK.

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 and refresh the level of understanding of the risks of modern slavery and human trafficking in our business.

As outlined within the mandatory e-learning, Ipsum recognises the internationally recognised "Signal for Help" hand gesture as a discreet means by which an individual may indicate that they are experiencing, or are at risk of, modern slavery, exploitation, abuse, coercion, or other forms of serious harm. See Appendix 1 for a visual representation of the Signal for Help.

We are committed to ensuring that our workforce, contractors, and supply chain are aware of this signal and understand how to respond appropriately. Where the Signal for Help is observed, individuals are expected to treat the situation as a safeguarding concern and respond in a calm, confidential, and non-confrontational manner, prioritising both the safety of themselves and the individual requiring help.

Individuals are encouraged to act if they see someone make the Signal for Help gesture, in accordance with the following principles:

- Escalate concerns promptly through usual management reporting channels, the Company Whistleblowing Policy or if appropriate, the Modern Slavery Helpline on 08000 121 700.
- If there is an immediate risk of harm, individuals are encouraged to follow emergency procedures, including contacting relevant authorities, in line with local guidance.
- Do not question, challenge, or confront the suspected individual or any accompanying person in a way that could increase risk.

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.

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.

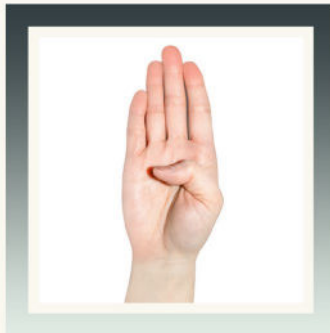
This statement is made and complies with section 54(1) of the UK Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking statement for the financial year ended 31 December 2026.

Andrew Cowan  
Chief Executive Officer  
6 January 2026

## Appendix 1 – Signal for Help



Step 1: The person shows their palm towards you.



Step 2: They place their thumb on their palm.



Step 3: They close their fingers over their thumb, and repeat these steps continually.