



INTRODUCTION FROM THE MANAGING DIRECTOR

We are committed to improving our practices to combat slavery and human trafficking. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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 have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and, as part of our 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. We expect our suppliers to hold their own suppliers to the same high standards.

OUR BUSINESS AND ORGANISATION STRUCTURE

O'Connor Utilities Limited provides design, build, installation and maintenance services to the Utilities Industry across Telecoms, Water, Gas and Power Networks. We operate throughout the UK & Ireland based from our Head Office in Manchester and through our regional depots in Wales & Yorkshire.

OUR SUPPLY CHAINS

We have a supply base of around 200 suppliers, the majority of which are based in the UK and are geographically aligned to projects, supporting our ethos of local support. We use our suppliers to provide a variety of industry related goods and services.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we undertake due diligence when taking on new suppliers and regularly review existing suppliers.

This includes;

- Broadly mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking using advice from the Global Slavery Index;
- Evaluating the modern slavery and human trafficking risks of each new supplier via a prequalification questionnaire and reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- Ensuring that all internal processes are being adhered to, for example ensuring that personnel provided by suppliers have the right to work in the UK, ensuring that limited company



contractors are paid into verified bank accounts and ensuring that suppliers of personnel do not use offshore payment solutions;

- Vigilance during on-site supplier audits and inspections; and
- Where breaches are identified, supporting a supplier to implement a corrective action plan with the aim of resolving breaches within an agreed time period, assisting to improve suppliers' practices by sharing best in-house practice within an open forum and imposing sanctions against suppliers that fail to improve their performance in line with an action plan or seriously breach our supplier code of conduct, which may include the termination of the business relationship.

We have in place systems to;

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Protect whistleblowers.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure that all those in our supply chain and contractors comply with our values and ethics, we have implemented processes to;

- Clearly communicate our expectations to our supply chain in respect of sustainability, anti-corruption and bribery and ethical procurement;
- Encourage our suppliers to cascade a similar process and expectation within their own business and supply chains;
- Ensure suppliers adhere to our policies regarding supplier selection, on-boarding, risk analysis, performance measurement and continual assessment by making adherence to these policies a part of our contracts with our suppliers;

We seek to monitor any risk areas and encourage anyone to report any concerns regarding supplier activities.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide our Principals, employees and workers with a copy of the modern slavery policy and encourage them to report any concerns to their manager. We have also included the policy in the Company Handbook and cover it in our business ethics training, which is delivered to all managers, supervisors and suppliers.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Our aim to ensure that 100% of new employees, workers and contractors are inducted on our Modern Slavery and Human Trafficking and sign an acknowledgement in respect of this;
- Our aim to ensure that 100% of new and existing suppliers with a turnover above £36 million provide us with a copy of their modern slavery and human trafficking statements;
- Our aim to issue our modern slavery and human trafficking policy to those suppliers who are judged to be potentially high risk i.e., existing and new suppliers of personnel and existing and



new overseas suppliers and obtaining signed confirmation from each supplier that they comply with our policy on modern slavery and human trafficking.

- Information provided from preferred suppliers.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains. We will continue to improve our processes, continue to encourage our Principals and staff to report any concerns they have.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 30 April 2021.

Signed by a Director:

Signed:		Name:	Peter Flitcroft
Position:	Support Services Director	Date:	01/04/2021