MODERN SLAVERY POLICY

SPL POWERLINES UK Group of Companies (SPL POWERLINES) combines its expertise in technical overhead line electrification systems and specialist resourcing to provide businesses with technical expertise and infrastructure installation for the rail industry.

Our Modern Slavery Policy and procedures support the SPL POWERLINES' ways of working that provide the basis for how we manage and operate across our entire business.

This policy sets out the commitments of SPL POWERLINES in relation to modern slavery. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and our organisation is committed to preventing in our business activities, and ensuring that our supply chains are free from, slavery and human trafficking.

This policy applies to employees at all levels, directors, officers, temporary agency workers, seconded workers, volunteers, agents, suppliers, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and SPL POWERLINES may review and amend this policy at any time. It will be reviewed on a regular basis to ensure it complies with relevant UK legislation.

Changes to this policy will be notified by publishing the updated version on SPL POWERLINES' intranet site.

Purposes

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms as shown below, 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. SPL POWERLINES will raise awareness of modern slavery and our expectations of what should be done to address any issues or suspicions, through this policy and associated training.

There are a number of crimes that are covered under the definition of modern slavery; these are:

- **Bonded labour** – individuals who are forced into debt by paying to get a job or mandatory equipment or have their passports taken to restrict their movements.
- **Forced labour** – individuals who are forced to work long hours for little or no pay in poor conditions, under verbal or physical threats to themselves or their families. This is the most common from of modern slavery.
- **Trafficking** – individuals or groups moved from one area to another for forced or bonded practices.
- **Criminal exploitation** – where a victim is exploited to commit a crime, for example, pickpocketing, shoplifting, drug trafficking and cannabis cultivation.
- **Sexual exploitation** – including sexual abuse, forced prostitution and abuse of children for the production of images or videos.
- **Domestic servitude** – where an individual is forced to work in private households with restricted freedom and work long hours for little or no pay.

Less commonly identified crimes include organ removal, forced marriage and illegal adoption.

Aims

We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships, and to ensuring modern slavery is not taking place anywhere in our own business or our supply chain.

In our supply chain, we ask our suppliers to implement due diligence for their own suppliers and subcontractors to ensure there is no slavery or human trafficking in their supply chain. All suppliers are obligated to follow our Supplier Code of Conduct which sets out the standards of behaviour that we expect from our partners.

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all employees to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective and current employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

SPL POWERLINES takes a strict approach to acts, actions and behaviours deemed to be in breach of this policy statement, and any such incidents will be dealt with in accordance with the applicable Disciplinary Procedure. Breaches of this policy statement may amount to gross misconduct resulting in summary dismissal.

SPL POWERLINES may terminate its relationships with other individuals and organisations if they are believed to have breached this policy.

Responsibilities

SPL Powerlines

- Actively works to ensure that risk of modern slavery within its own business activities, and that of its supply chain, is minimised and will adhere to the requirements of all relevant local and national laws.
- Ensures our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of a business relationship and is reinforced as appropriate thereafter.
- Provides employees and managers with appropriate information and training in order to ensure effective communication and understanding of, and compliance with, this policy.
- Prohibits employees at all levels, directors, officers and representatives of the business making threats of violence, harassment or intimidation, committing acts of discrimination and confiscating workers original identification documents.
- Prohibits child labour and the use of worker-paid recruitment fees.
- Ensures workers have freedom of movement, freedom of association and the right to resign from their employment with the company.
- Encourages the reporting of any incidents or suspicions by all employees and is committed to taking appropriate action without undue delay.

Employees

- Must familiarise themselves with this policy and act in accordance with SPL POWERLINES' commitments at all times; undertaking any training that is required of them by the company.
- Must escalate any concerns or issues they may perceive to be in breach of this policy to local management or HR swiftly and in confidence; if it doesn't feel right, tell someone.
- Should use SPL POWERLINES' whistleblowing system to report concerns in confidence if they feel they cannot talk to local management or a HR representative; log onto the internal IMS portal at https://powerlinesgroup.sharepoint.com/sites/SPLIMS and report a note of the concerns under the 'note reporting' section on the front page of the IMS.
- Must co-operate with managers in eliminating any risk of modern slavery and human trafficking within SPL POWERLINES' own activities and supply chain.

Managers

- Have a personal responsibility for ensuring this policy is communicated, understood and applied in their business area; ensuring any relevant training is delivered to all employees within their area of responsibility as required by the company.
- Will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to have been mistaken.
- Must treat concerns raised by employees seriously; investigating and escalating as appropriate and taking any required action without undue delay.

Supply Chain

Our supply chain is made up of suppliers, subcontractors and consultants across multiple categories. They are required to sign up to the Supplier Code of Conduct and includes requirements to commit to compliance with SPL POWERLINES' ethics, anti-bribery and corruption and modern slavery and anti-discrimination standards. There is an Exceptions process applied where a supplier is unable to sign up to the Supplier Charter which requires a business case to be submitted for approval by the CPO and General Counsel.

The commitments to SPL POWERLINES include that the supply chain organisation:

- Conducts its business in a manner that is consistent with the Modern Slavery Act 2015 and fundamental protection of Human Rights which includes implementation of a due diligence procedure for its own supply chain to ensure that there is no forced or compulsory labour, slavery or human trafficking taking place.
- Maintains fair competition and avoids complicity in its business practices.
- Ensures there is full compliance with all relevant legislation relating to equality and diversity, in particular the Equality Act 2010 and is committed to promoting equality of opportunity and diversity within the organisation and its supply chain.
- Ensures that any concerns or non-conformities must be reported through the SPL POWERLINES Ethics & Compliance reporting system either by contacting the General Counsel or the CPO.

As part of the supply chain management and due diligence requirements the supply chain is committed to transparency and improvement which includes:

- Undertaking an annual assessment and participation in any quality, health and safety and environmental audits to monitor performance, as required.
- Compliance with all statutory, regulatory and SPL POWERLINES reporting requirements.
- Providing information on the provenance of products and being transparent in relation to identification of enterprise risks, processes and working practices.

Implementation of Policy

This policy will be reviewed regularly to ensure our statements of commitment are appropriate and in line with current legislation. SPL POWERLINES will also review all other policies that may be of relevance to, or in connection with, this policy to ensure our commitments are sustained.

Signed by:
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