



Modern Slavery Statement

Financial Year Ended 30 April 2024

This statement is made by **CCUtilities Ltd** pursuant to section 54 of Part 6 of the **UK Modern Slavery Act 2015**. It sets out the steps taken during the financial year to mitigate the risk of modern slavery in our business and supply chains.

Introduction from the Chief Executive Officer

At **CCUtilities Ltd**, our business is guided by our **Code of Conduct**, which sets out the principles through which we aim to create a responsible and sustainable business for all stakeholders, including shareholders, clients, employees, suppliers, contractors, partners, local communities, and the public.

Sustainable growth is only possible in an environment built on **respect, integrity, transparency, and fairness**.

A key priority is ensuring that we **do not engage directly or indirectly in slavery or human trafficking**. Preventing modern slavery is a top priority for our executive management team and Board of Directors.

Modern slavery is a serious crime and violation of human rights. It includes slavery, servitude, forced labour, bonded labour, child labour, and human trafficking. **CCUtilities Ltd operates a zero-tolerance approach** and is committed to ethical business practices supported by robust systems and controls to prevent modern slavery in our operations and supply chains.

We expect the same high standards from all contractors, suppliers, and business partners. Our contracts explicitly prohibit the use of forced, compulsory, or trafficked labour, and suppliers are expected to enforce the same standards throughout their own supply chains.



Our Business and Organisational Structure

CCUtilities Ltd provides **design, build, installation, and maintenance services** across the Energy, Utilities, and Digital Infrastructure sectors.

We operate across the UK and Ireland, headquartered in [insert HQ location], with a network of offices and operational premises.

Our Supply Chains

We manage a diverse supply chain, primarily UK-based and aligned with local projects. Suppliers provide a variety of goods and services to support our engineering, construction, and operational activities.

Our Policy on Slavery and Human Trafficking

We are committed to ensuring that there is **no modern slavery or human trafficking** in our business or supply chains.

Our **Modern Slavery and Human Trafficking Policy** reflects this commitment by:

- Acting ethically and with integrity in all business relationships.
- Implementing and enforcing effective systems and controls to prevent exploitation.
- Aligning with **International Labour Organisation (ILO) Conventions** and the **United Nations Convention on the Rights of the Child**.



Risks of Modern Slavery in Operations and Supply Chains

- **Direct operations:** Strong employment and HR standards, along with transparent workforce management, mean the risk of modern slavery is **low**.
- **Supply chains:** Potential risks relate to materials, goods, and services. These include deceptive recruitment practices, child labour, underpayment, exploitation of migrant workers, and bonded labour. Residual risk is assessed as low due to sourcing locations, supplier performance history, and control measures in place.

We provide **confidential and anonymous reporting channels** through our **Whistleblowing Policy**, and our Code of Conduct and Supplier Code of Conduct require employees and suppliers to report any non-compliance.

Due Diligence Processes

We implement the following processes to identify and mitigate risk:

- Mapping supply chains to assess service- or location-specific risks.
- Risk evaluation of new suppliers and periodic reviews of existing suppliers.
- Verification of personnel (right-to-work checks, DBS checks where applicable, verified payment methods).
- On-site audits and inspections; corrective action plans are implemented if breaches are identified, and failure to comply can result in termination of the business relationship.
- Enhanced monitoring, including:
 - Annual reassessment of suppliers and upon contract changes.
 - Induction training for new staff and operatives, including modern slavery awareness.
 - Access to an independent whistleblowing hotline.



Supplier Adherence to Our Values

We have **zero tolerance for slavery and human trafficking**. Measures to enforce this include:

- Communicating expectations regarding ethics, sustainability, and anti-bribery to all suppliers.
- Requiring suppliers to cascade these expectations within their own supply chains.
- Contractual obligations for suppliers to comply with our policies and performance monitoring.
- Use of a centralised subcontractor diligence platform to monitor adherence to modern slavery requirements.

Training and Awareness

- All employees, suppliers, and subcontractors receive a copy of our Modern Slavery Policy.
- The policy is included in the Employee Handbook and in **Business Ethics Training**.
- Training is mandatory for managers, supervisors, and subcontractors.

Measuring Effectiveness

We track effectiveness using the following KPIs:

- **100%** of new employees, workers, and contractors acknowledge receipt of the Modern Slavery Policy.
- **100%** of new and existing large-scale suppliers provide a copy of their Modern Slavery Statement.
- High-risk suppliers are required to provide written confirmation of compliance.



Further Steps

We will continue to strengthen our approach by:

- Regularly reassessing supply chain risks.
- Expanding supplier training and engagement.
- Encouraging reporting of concerns via line managers, General Counsel, or the independent whistleblowing hotline.

Consultation and Approval

This statement was prepared with input from **CCUtilities Ltd** management teams, including commercial, finance, procurement, legal, governance, and compliance teams.

It was **approved by the Board of CCUtilities Ltd on [insert approval date]**.

Signed:

A handwritten signature in black ink, consisting of several loops and flourishes, positioned above the name of the signatory.

Director
CCUtilities Ltd