

POL 03

Powersystems Modern Slavery and Human Trafficking Policy and Statement

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1. Policy Statement

Powersystems UK Limited is committed to conducting its business ethically, responsibly and in a way that prevents modern slavery, human trafficking, servitude, forced or compulsory labour and child labour from taking place in any part of our own operations or supply chain.

We recognise that modern slavery is a serious crime and a violation of fundamental human rights. We adopt a zero-tolerance approach and expect the same standards from our employees, contractors, suppliers, subcontractors and business partners.

This policy and statement are issued with reference to section 54(1) of the Modern Slavery Act 2015 and the current UK Government guidance on publishing annual modern slavery statements. It replaces the previous Powersystems Modern Slavery Statement, version 10.0.

2. Purpose

The purpose of this policy is to set out Powersystems' commitment, responsibilities and arrangements for preventing, identifying, escalating and responding to modern slavery risks within our business activities and supply chain.

This policy also supports clear evidence of the steps taken by Powersystems during each financial year, including supplier due diligence, employee awareness, right to work checks, project risk consideration and reporting arrangements.

3. Scope

This policy applies to Powersystems Limited and all employees, directors, workers, agency workers, contractors, subcontractors, suppliers, consultants and other persons working on our behalf. It applies to all Powersystems activities, including office-based work, project delivery, site operations, procurement, subcontractor engagement and supplier management.

Powersystems is a high voltage electrical contractor delivering infrastructure projects throughout the UK, supporting industrial, utility, renewable energy and generation customers. Our operations are managed from our main office near Bristol, with an additional satellite office in Glasgow and a mobile workforce working across various project locations.

4. Our Commitments

4.1 Legal and ethical commitment

- ▶ We will not use, support, condone or ignore any form of modern slavery, forced labour, servitude, human trafficking or child labour
- ▶ We will comply with applicable legal requirements, including the Modern Slavery Act 2015 and relevant UK Government guidance
- ▶ We will expect our suppliers, contractors and subcontractors to work to standards that are comparable with, or stronger than, our own
- ▶ We will require modern slavery expectations to be considered within supplier approval, contractor onboarding, subcontractor management and project delivery arrangements

4.2 Understanding our risk

Powersystems consider the overall risk of modern slavery within its directly employed workforce to be low, due to direct employment controls, right to work checks, payroll controls, supervision and established recruitment processes. However, we recognise that our risk is not zero, especially where work involves subcontracted labour, labour-only services, temporary workers, agency arrangements, accommodation linked to work, overseas manufactured goods, extended supply chains or limited visibility over lower-tier suppliers.

Modern slavery risk will be considered as part of supplier and contractor approval, project planning and ongoing monitoring. Where higher risk indicators are identified, enhanced due diligence will be required before work is awarded or continued.

4.3 Due diligence and supply chain controls

- ▶ Supplier and contractor checks will include modern slavery questions within prequalification, supplier evaluation or onboarding arrangements where appropriate
- ▶ Relevant suppliers and contractors may be asked to provide their modern slavery statement, policy, code of conduct, labour standards or equivalent evidence
- ▶ Powersystems will make modern slavery expectations clear through procurement, subcontractor and standard terms and conditions where applicable
- ▶ Where a supplier or contractor cannot provide suitable assurance, the matter must be escalated to the relevant manager, SHEQ and/or senior management before appointment or continued use
- ▶ Where credible concerns are identified, Powersystems may pause work, request corrective action, remove a supplier from the approved supplier list or terminate the relationship, depending on the circumstances

4.4 Project and site controls

Project Managers and site supervisors must remain alert to modern slavery indicators during project planning, mobilisation and site delivery. Any project-specific factors that may increase modern slavery risk must be escalated to the relevant Director and SHEQ for review. This may include use of unfamiliar labour providers, labour-only subcontracting, workers appearing controlled by others, poor welfare arrangements, language barriers, withheld documents, unexplained transport or accommodation arrangements, or workers appearing unable to speak freely.

4.5 Employment controls and worker protection

- ▶ Right to work checks will be completed before employment starts, in line with legal requirements
- ▶ Workers will be paid through approved payroll or contract arrangements and must not be charged improper recruitment fees by or on behalf of Powersystems
- ▶ Employees and workers must have access to appropriate welfare arrangements and must be able to raise concerns without fear of retaliation
- ▶ Any concern relating to exploitation, coercion, threats, withheld documents, unsafe living conditions or forced labour must be treated seriously and escalated promptly

4.6 Training and awareness

Powersystems will provide appropriate modern slavery awareness to employees whose roles may identify or manage risk, including those involved in procurement, onboarding, project management, site supervision, operations management, labour recruitment, and other activities identified through project planning and risk assessment processes. Awareness will include what modern slavery is, how it may present in construction and infrastructure supply chains, potential indicators, and how to report concerns.

Modern slavery information will be included within the SHEQ induction and e-learning is refreshed periodically. Training and communication records must be retained so that Powersystems can evidence that commitments

made within this policy are being implemented in practice.

4.7 Reporting and response

Any employee, worker, contractor or supplier who suspects modern slavery or human trafficking must report the concern immediately to their line manager, site supervisor, SHEQ, People Team or a Director. Concerns may also be raised through the company's whistleblowing or grievance arrangements where appropriate.

If there is an immediate risk to life or safety, the emergency services must be contacted by calling 999. Where concerns relate to potential victims, Powersystems will seek guidance from appropriate authorities and support services and will not take action that knowingly places a potential victim at further risk.

Important: Do not confront a suspected exploiter or disclose concerns to a person who may be controlling the potential victim. Escalate the concern internally and, where necessary, to the appropriate authority or emergency services.

4.8 Monitoring effectiveness

Powersystems will monitor the effectiveness of this policy through suitable measures, which may include:

- ▶ completion and retention of relevant training and induction records
- ▶ supplier and contractor modern slavery questionnaire responses
- ▶ modern slavery clauses or expectations included in relevant procurement documents and terms
- ▶ records of escalated concerns, investigations and actions taken
- ▶ internal audit, management review and document review findings
- ▶ review of higher-risk project or supplier arrangements where applicable.

Powersystems is committed to the continual improvement of its modern slavery and human trafficking arrangements through monitoring, internal audits, management review, supplier engagement, lessons learned and periodic review of this policy and statement.

5. Roles and Responsibilities

Directors

- ▶ Provide leadership by approving this policy and statement, ensuring sufficient resources, governance, oversight, and support are in place to promote ethical business practices and maintain compliance with modern slavery obligations.

Senior Managers and Directors

- ▶ Ensure modern slavery risks are considered within their areas of responsibility, including procurement, project delivery and supplier management.

Project Managers and site supervisors

- ▶ Include consideration during project planning phase, remain vigilant on projects, escalate higher-risk arrangements and report any concerns or indicators identified during site activities.

People Team / Procurement / SHEQ

Support awareness through training, supplier onboarding checks and controls, policy review by People Team and escalation of concerns.

Employees

- ▶ Employees are responsible for complying with this policy, completing any required modern slavery awareness training, remaining alert to potential indicators of modern slavery or human trafficking, and reporting any concerns promptly to either their line manager, site supervisor, People Team, SHEQ, or a

Director. Employees must not ignore concerns or take action that could place a potential victim at further risk.

Suppliers, contractors and subcontractors

- ▶ Suppliers, contractors and subcontractors are responsible for conducting their activities in a way that prevents modern slavery and human trafficking within their own operations and supply chains. They are expected to comply with applicable legislation, provide suitable assurance when requested, cooperate with Powersystems' due diligence processes, and report any actual or suspected modern slavery concerns linked to work undertaken for Powersystems.
- ▶ Failure to meet these expectations may result in further investigation, corrective action, suspension of work, removal from the approved supplier list or termination of the business relationship.

6. Communication

This policy will be communicated internally through induction. It will be made available to employees and to interested parties where appropriate.

The current approved statement must be available on the Powersystems website where the business is required to publish, and a prominent link should be maintained in line with statutory guidance. Previous statements should be retained where practical to demonstrate progress over time.

Suppliers and contractors will be made aware of Powersystems' expectations through onboarding, procurement documents, supplier questionnaires, contractual terms, project communications or other suitable methods.

7. Approval and review

This Policy will be reviewed periodically through the company's management review arrangements and sooner where significant changes occur in legislation, guidance, company structure, supply chain arrangements, project activities, or where findings from audits, incidents, supplier performance monitoring or management reviews indicate a need for revision. The Statement will be updated and republished as necessary to reflect the relevant reporting period and applicable legal requirements.

8. Document control

POLICY DOCUMENT CONTROL		
Version	Purpose	Date
Document Title	Modern Slavery and Human Trafficking Policy and Statement	07/08/2026
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POLICY AMENDMENT HISTORY		
Version	Purpose	Date
1.0 - 10	Annual reviews	03/03/2025
11	Updated to new policy template; aligned to Modern Slavery Act 2015, current guidance, 2024 and 2026 internal audit findings and strengthened due diligence, training, risk and communication requirements.	00/00/0000
12		00/00/0000
13		00/00/0000
14		00/00/0000
15		00/00/0000
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POLICY DOCUMENT ISSUE RECORD			
	Name	Position	Date
Prepared by	Marlize Wood	SHEQ Advisor	07/08/2026
Process Owner	Angela Jones	Head of People	10/08/2026
Reviewed by	Angela Jones	Head of People	10/08/2026
Approved by	Chris Jenkins	Managing Director	10/08/2026

9. Reference documents

- ▶ Modern Slavery Act 2015, including section 54 Transparency in Supply Chains
- ▶ UK Government guidance: Publish an annual modern slavery statement
- ▶ Modern Slavery: Statutory Guidance for England and Wales under section 49 of the Modern Slavery Act 2015
- ▶ Powersystems supplier approval, contractor onboarding, right to work, whistleblowing, HR and SHEQ management arrangements