



MODERN SLAVERY & HUMAN TRAFFICKING POLICY

Utilities & Fibre Network LTD

113 RAILWAY STREET
GRIMSBY
NORTH EAST LINC
DN32 3BN

This document applies to all company employees.

Modern Slavery & Human Trafficking Policy

Company: Utilities & Fibre Networks (UFN) **Date:** 29 September 2025

1. Policy Statement

Modern slavery, in all its forms, is a crime and a gross violation of fundamental human rights. UFN has a **zero-tolerance approach** to modern slavery and is committed to acting ethically and with integrity in all our business relationships. We will implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chains.

2. Risk Assessment

UFN will periodically assess its business and supply chains to identify and evaluate potential risks of modern slavery. This assessment will consider high-risk factors such as geographic location, business sector, and the nature of services being provided.

3. Supply Chain Due Diligence

We will implement a due diligence process for our supply chain. This includes supplier vetting, including the use of self-assessment questionnaires, including anti-slavery clauses in our contracts, and retaining the right to audit suppliers.

4. Training

To ensure a high level of understanding of the risks of modern slavery, we will provide training to relevant members of staff, particularly those involved in procurement and recruitment.

5. Reporting Mechanisms (Whistleblowing)

If you suspect a breach of this policy, you are encouraged to raise the issue with your **Line Manager** or the **Managing Director**. We are committed to ensuring no one suffers any detrimental treatment for reporting a suspicion in good faith.

6. Monitoring and Review

The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations. This policy will be reviewed annually to ensure its effectiveness.

Paul Richard Grant Managing Director

Appendix A: Supplier Self-Assessment Questionnaire

Introduction: As part of our commitment to combatting modern slavery, UFN requires its key suppliers to complete this questionnaire. Your honest responses will help us to work together to ensure our shared supply chains are free from exploitation.

Section A: Company Details

- **Company Name:**
- **Contact Person:**
- **Services Provided to UFN:**

Section B: Policies & Governance

1. Do you have your own policy statement that specifically addresses modern slavery and human trafficking? (Yes/No)
2. Who in your organisation has lead responsibility for ensuring compliance with your anti-slavery policies? (Name/Job Title)

Section C: Risk Assessment & Due Diligence 3. Have you assessed your own business and supply chain for modern slavery risks? (Yes/No) 4. Do you include anti-slavery clauses in your contracts with your own suppliers? (Yes/No)

Section D: Worker's Rights & Recruitment 5. Do you ensure all your employees have a written contract, in a language they can understand? (Yes/No) 6. Are all your employees free to leave their employment after giving reasonable notice? (Yes/No) 7. Do you, or any recruitment agencies you use, ever charge workers a fee for finding them employment? (Yes/No) 8. Do you, or any recruitment agencies you use, ever retain workers' identity documents (e.g., passports, ID cards)? (Yes/No)

Section E: Declaration I confirm that the information provided in this questionnaire is accurate to the best of my knowledge.

- **Name:**
- **Job Title:**
- **Date:**
- **Signature:**

PAUL RICHARD GRANT
MANAGING DIRECTOR

Signed



Date: 21/09/25