POLICY DOCUMENT

BK-COB-PL-0080

TITLE: BUUK1 MODERN SLAVERY STATEMENT	DOCUMENT NO: BK-COB-PL-0080
Document Business Owner:	Chief Financial Officer

Author/Reviewer:	Company Secretary	Chris Mumford	June 2023
Approver:	Chief Financial Officer	Darryl Corney	June 2023
Authoriser:	Chief Executive Officer	Nicola Hindle	June 2023

Document Review – Latest Update

Document Version	Amendment Details
7	Statement updated and approved by the Board on 14th June.

Full Document History is available at the end of this document

Next Review Due	June 2024

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2022

This statement is made by BUUK Infrastructure No 1 Limited [registered number 08246423] pursuant to section 54, Part 5 of the Modern Slavery Act 2015 (Act). It constitutes our slavery and human trafficking statement for the financial year ended 31 December 2022 and sets out the steps taken that aim to ensure that slavery or human trafficking did not take place in our business and supply chain.

We are a holding company and have approximately 2000 employees.

OUR BUSINESS AND SUPPLY CHAIN

Our business is and involves the connection of utility networks to housing and commercial developments. As our supply chain involves several entities or projects performed by a prime contractor with a series of sub-contractors, we only exercise control over our relationship with our contractual counterparty and persons who contract with that counterparty will be performing services for the counterparty and not for other persons in the contractual chain. The principal way in which we approach modern slavery risks in a supply chain is by using the types of procedures set out in our Policy (such as risk based due diligence and the use of anti-slavery terms and conditions) in the relationship with our contractual counterparties, and by seeking those counterparties to adopt a similar approach with the next part in the supply chain, and so on down the supply chain. The provision of corporate services between group entities are not treated as part of our supply chain/ making investments and making recommendations in relation to is investments is not considered to be a supply chain.

We have commitment to conduct our business and all our relationships based on integrity. This commitment is contained in our Business Conduct and Ethics Code.

During this year we:

- reviewed our anti-slavery and human trafficking policy (Policy) which reflects our commitment to:
    - implementing and enforcing effective systems and controls designed to ensure modern slavery does not occur in our business and supply chains;
    - being transparent in doing so through our disclosure obligations under the Act.;
- used risk assessments. Our efforts to prevent modern slavery are designed to be proportionate to the modern slavery risks we face, recognising that it can vary according to the jurisdictions, sectors, suppliers, the amount of control we have over our supply chain and other governance factors. Risk assessments are, therefore, integral to our attempts to eradicate modern slavery in our business and supply chains. In particular, we seek to ensure that modern slavery risk is managed as close to its source as possible, and by the management teams that have the most knowledge and expertise in the business or risk area. Modern slavery risks vary based on the characteristics of each business. The specific manner and methodologies by which these risks are addressed and mitigated vary based upon, among other things, the nature of the risks and of the assets and operations to which they apply, the geographic location of the assets, the economic, political and regulatory environment, and our assessment of the benefits to be derived from such mitigation strategies. While no practices and procedures are capable of identifying and preventing all

modern slavery, our risk based approach is designed to enable efforts to be focussed where they are most needed and can most help eradicate modern slavery.

- made available training to our staff on modern slavery risks;
- included (on a risk adjusted basis) specific prohibitions in contracts with our direct suppliers against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children;
- enabled our Policy to become embedded and understood throughout our organisation through internal and external communication;
- had a due diligence protocol in place that includes anti-slavery considerations, which applies when engaging or renewing third party suppliers;
- could, if any employee breaches our Policy, subject them to disciplinary action, which could result in dismissal for misconduct or gross misconduct;
- may terminate our relationship with other individuals and organisations working on our behalf if they breach our Policy. Factors guiding the appropriate action to be taken in each situation will depend on our control or influence over the entity concerned, the severity of the abuse, the safest outcome for the potential victims and whether terminating the relationship with the entity itself would have adverse human rights consequences; and
- encouraged staff, our suppliers and business partners and anyone else to whom our Policy applies to report any concerns about modern slavery related to its businesses and direct supply chains in accordance with our Code and our whistle blowing policy. Our whistle-blowing policy is designed to make the reporting process as simple as possible.

Nicola Hindle

Nicola Hindle

Chief Executive Officer

BUUK INFRASTRUCTURE NO 1 LIMITED

Date: 27/06/2023

APPENDIX – LIST OF COMPANIES COVERED BY THIS STATEMENT

BUUK Infrastructure Issuer UK Plc
BUUK Infrastructure Number 1 Limited
BUUK Infrastructure Number 2 Limited
Connect Utilities Limited
GTC Pipelines Limited
GTC Utility Construction Limited
Independent Community Heating Limited
Open Fibre Networks (Wholesale) Limited
Independent Meters Limited
Open Fibre Networks Limited
Independent Pipelines Limited
Independent Power Networks Limited
Independent Service Provider Limited
Independent Water Networks Limited
Inexus Connections Limited
Inexus Group (Holdings) Limited
Metropolitan Infrastructure Limited
Power On Connections Limited
Power On Investments Limited
Quadrant Pipelines Limited
The Electricity Network Company Limited
EPLR Holdings Limited
Express Utilities Limited
EPL&R Utilities Limited
Ultrastream Business Services Limited
GTC Infrastructure Limited
Passiv UK Limited
Passiv Capital Limited
Arto. Energy Limited
Levelise Limited

DOCUMENT HISTORY

1	Mar 2017	Issued
2	June 2019	Document updated
3	May 2019	Document updated
4	June 2021	Document Updated
5	June 2021	Document Updated
6	May 2022	Document Updated
7	June 2023	Document Updated