

SPL Powerlines UK Group of Companies Modern Slavery Act Compliance Statement 2023

Introduction

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. This compliance statement has been published in accordance with the Modern Slavery Act 2015 (the “Act”) and sets out the steps taken by SPL Powerlines UK Holding Ltd and other group companies in the UK “SPL” to prevent modern slavery and human trafficking in its business and supply chains. This constitutes the SPL compliance statement for the financial year ending 31st December 2023. SPL comprises a number of different operating business units, details of which can be found at the end of this statement. This statement has been approved by the Board of Directors of SPL Powerlines (UK) Holding Ltd and is signed by Guenter Kielmayer and Martin Hawley, the Managing Directors of the UK SPL group of companies.

Organisational Structure

SPL operates as a railway overhead line specialist; design, construction and maintenance of overhead electrical line equipment, supply of safety critical staff, plant and training and supply of road rail access equipment.

SPL has 6 UK offices employing around 300 employees; the head office is located in Coatbridge, Scotland. SPL has an annual turnover of approx. 160M GBP.

Purpose

The statement sets down SPL’s commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and those of its supply chain. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking. As part of our supply chain ongoing boarding process we have introduced a requirement for our supply chain to provide their Modern Slavery Statement prior to acceptance.

We will continue conducting the following activities in the Year 2024:

- Risk assessment and management;
- Key performance indicators to measure effectiveness of steps being taken;
- Incorporating training on Modern Slavery in staff induction processes;
- Specific training programme to all staff on Modern Slavery in addition to current compliance training; and
- Updating our Code of Conduct to include more detail on Modern Slavery.

Responsibilities under the Act

We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them. Our staff and those we work with are encouraged to challenge any unethical, dishonest or unacceptable behaviour they encounter and to speak up if they see things of concern.

All reports are treated seriously and all concerns that are raised in good faith are recorded and investigated confidentially. In 2023, no concerns were made related to modern slavery. Any issues raised and actions taken are reported to the SPL Board of Directors.

This modern slavery statement is published on the UK Government Modern Slavery Statement Registry.

Our People

We have taken action to prevent modern slavery and human trafficking in our own business. Our Code of Conduct sets out the principles in which we expect all staff to adhere to including protecting Human Rights.

Our recruitment policy explicitly commits us to the prevention of modern slavery and guidance on preventing modern slavery is provided to all recruiting managers. SPL HR carry out face to face checks on original right to work documents when they interview prospective employees.

Our Supply Chains

Our supply chain is located throughout the UK and SPL Powerlines UK Ltd recognises that it has a responsibility to take a robust approach to slavery and human trafficking in support of human wellbeing. The company is committed to conducting business ethically and to ensuring that there is no slavery or human trafficking in our business or in our supply chains. It is a requirement during our onboarding process for our supply chain to provide their Modern Slavery Statement.

We continue to ensure we have robust systems and processes in place when engaging with the potential supply chain and on boarding new services.

We have a supply chain team who is responsible for ensuring the processes and assurance checks are in place with clear record keeping and data storage. We work within a tight and lean time alongside our suppliers' customer service teams to ensure that our principles are aligned.

On a regular basis we review our supplier approval process and our approved supplier database to remove unnecessary companies and meet the company current requirements.

Policies on Slavery and Human Trafficking

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

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we continuously review company process and ensure this is being carried out in accordance with the documented process in order to prevent and effectively identify and challenge any modern slavery issues. With these controls in place we act ethically and with integrity to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Due Diligence Processes for Slavery and Human Trafficking

In order to mitigate risk we have a number of processes and principles in place:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains;
- Protect whistle blowers - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.

SPL Powerlines UK Ltd.'s anti-slavery initiatives:

- Policies – The Legal Department is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the Company;
- Risk assessments – The Procurement and HSQE Department are responsible for risk assessments in respect of human rights and modern slavery by a process of looking at best practice and adapting to the needs of the Company;
- Due diligence: The Human Resources Department is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain compliance programme.

SPL Powerlines UK Ltd supplier agreements contain clauses to combat slavery and human trafficking and we continue to review supplier agreements to ensure compliance with anti-slavery measures.

We have a departmental identified team which form part of this process:

- Legal;
- Assurance;
- Human Resources;
- Procurement; and
- Health & Safety.

Training

To ensure and prevent risks of modern slavery and human trafficking in our supply chains and our business, we continue to review and identify suitable training to the relevant teams. In 2023, we delivered to all staff two new training webinars: Introduction to Modern Slavery; and Due Diligence in Combatting Modern Slavery. In addition, we provide annual compliance training to our entire workforce which includes a section on Human Rights and Modern Slavery.

We regularly review and challenge our supply chain to safeguard against our business partners impacting our organisation negatively.

This is carried out via annual policy reviews and supply chain review.

This Modern Slavery Statement will be regularly reviewed and updated annually in line with the company financial reporting.

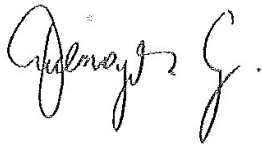
This statement is made on behalf of SPL Powerlines UK Holding Ltd and its subsidiaries:

- SPL Powerlines UK Ltd; and
- Power and Infrastructure Resourcing Ltd.

This Modern Slavery and Human Trafficking Statement has been approved and authorised:

Name:

Guenter Kielmayer



Martin Hawley



Position:

Managing Directors

Date:

6th December 2023