

## Introduction

This statement sets out our actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our business and supply chains.

This statement relates to our actions and activities during the financial year 2018 – 2019.

We recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

## Our Business

Compete Utilities provide design, build, operations and maintenance services across 6 main sectors; covering Telecoms, Water, and Power Networks, Civil Engineering Schemes, Specialist Plant Hire, and Support Services.

Our civil engineering/utilities expertise extends across both infrastructure and non-infrastructure works. Complete Utilities deliver a full service package supporting planning, scheduling, management, highway management, public liaison and 24 hour support services. We operate under a variety of contract forms such as open book, design and build and full turnkey contracts. In addition to traditional projects, we have a long track record of working in frameworks, partnerships and alliances

Complete Utilities Ltd operates regionally from its central depot near Gloucester. From here, and numerous satellite facilities, we achieve large-scale coverage of the East & West Midlands, and the South West. We will provide services outside of these areas dependent of feasibility.

Customer service and health and safety are at the heart of our delivery model. We demonstrate industry-leading safety performance and provide measurable year-on-year improvements in service standards.

## Our Supply Chain

We have a supply base of around 200 suppliers, the majority of which are based in the UK and are geographically aligned to projects, supporting our ethos of local support. We use our suppliers to provide a variety of industry related goods and services

## Our Anti-Slavery Policy

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.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Due Diligence Processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we undertake due diligence when taking on new suppliers and regularly review existing suppliers.

This includes:

- broadly mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier via a prequalification questionnaire and reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- ensuring that all internal processes are being adhered to for example ensuring that personnel provided by suppliers have a Right to Work in the UK, ensuring that we do not sponsor new migrants into the UK, ensuring that limited company contractors are paid into verified company bank accounts and ensuring that suppliers of personnel do not use offshore payment solutions;
- conducting on-site supplier audits or assessments, which have a greater degree of focus on slavery and human trafficking where a supplier are considered to be higher risk; and where violations are identified, supporting a supplier to implement a corrective action plan with the aim of resolving violations within an agreed time period, assisting to improve a suppliers' practices by sharing best in class practices within an open forum and invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct which may include the termination of the business relationship.

We have in place systems to:

- 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; and protect whistle blowers.
- Supplier Adherence to our Values

We have a zero tolerance approach to slavery and human trafficking. To ensure that all those in our supply chain comply with our values, we have implemented processes to:

- clearly communicate our expectations to our supply chain in respect of sustainability, anticorruption and bribery and ethical procurement;
- encourage our suppliers to cascade a similar process and expectation within their own business and supply chain;
- ensure adherence to our policies at supplier selection, on-boarding, risk analysis, performance measurement and continual assessment; and ensure that adherence to our policies is a contractual obligation in our agreements with suppliers.

We have a committed compliance team, which includes stakeholders from the following departments:

- Operations
- Project Management
- Human Resources
- HSEQ

## Awareness Training

To ensure a level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business we shall implement an awareness document into our company handbook, covered in induction for all new employees and display on our company website.

## Our Effectiveness in Combating Slavery and Human Trafficking

We will use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- We shall ensure that 100% of all new employees are inducted on our Anti-Slavery policy and that they sign an acknowledgement in respect of this;
- We shall complete a comprehensive review of our existing supply chain by 31/12/18
- We shall request from 100% of existing and new suppliers with a turnover above £5m a copy of their Modern Slavery and Human Trafficking Statement;
- We consider existing suppliers and new suppliers of personnel and existing and new overseas suppliers as potentially 'high risk' areas in respect of modern slavery within our organisation. With this focus in mind we shall issue our Anti-Slavery policy to 100% of these particular suppliers and request signed confirmation from each of these suppliers that they manage their business in the required manner and that they shall comply with our Antislavery Policy.

## Further Steps

In addition to pursuing the Key Performance Indicators above, we intend to develop an Anti-Slavery training and awareness programme as a further step to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31/07/19.

This statement has been approved by Complete Utilities Board, who will review and update it annually.

Managing Director Steve Chaplin

