

Anti-Slavery and Human Trafficking Policy Statement



Green Frog Utilities Limited (“GFU”) recognises that slavery and human trafficking remains a hidden blight on our global society. GFU’s aims to identify our responsibility by alerting staff to the risks, however small, in our business and the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

GFU design and build utility infrastructure and support these works, the Company has a varied supply chain providing a range of goods, products, and services.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. GFU has a zero-tolerance approach to any form of modern slavery. We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or 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 avoid any form of modern slavery occurring in our supply chains.

This policy takes into account and supports, the policies, procedures, and requirements documented in our integrated management systems (IMS). The implementation and operation of this management system underlines our commitment to this policy statement.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

GFU will achieve these aims by our initiative to identify and mitigate risk (but not limited to) the following ways:

- ✓ Vetting and investigation of our supply chain on prequalification questionnaires (contractors, sub-contractors, policies, contracts etc.).
- ✓ Continually audit & review our practices for checking all employees are paid at least the minimum wage and have the right to work.
- ✓ We encourage the reporting of concerns and the protection of whistle blowers.
- ✓ The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- ✓ We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide in-house training to relevant members of staff as required.

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All Directors have been briefed on the subject.

We use the following controls 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:

- ✓ Completion of audits by Directors, Senior Managers, Safety Managers and Advisors;
- ✓ Use of labour monitoring and payroll systems;
- ✓ Communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

A handwritten signature in black ink, appearing to read "AP", is positioned above the name of the signatory.

Adam Pokorski

Managing Director

Dated: 11th May 2020