

### Introduction from the Board of Directors of Delton Power Limited

This statement highlights the key activities we have undertaken during the year ending 31st December 2022 to combat modern slavery in our organisation and supply chain. It continues to be a priority for Delton Power Limited to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain.

### Organisational structure and supply chains

This statement covers the activities of Delton Power Limited, our business provides electrical infrastructure construction and refurbishment services to electricity distribution network operators and their framework contract partners throughout the UK.

Our supply chain is an integral part of our delivery capability to our clients and all our suppliers are required to complete our Supplier Pre-Qualification Questionnaire. Suppliers must confirm that procedures and processes are in place to ensure compliance with their obligations under the Modern Slavery Act 2015 including records of any notice served upon it regarding the same. Such requirements flow down to the supplier's supply chain.

### Our Policies on Slavery and Human Trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies

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

Having assessed the risk of modern slavery and human trafficking within our business, we have determined that the risk remains low. We operate solely United Kingdom and follow the laws regarding recruitment and employment.

Employees all have a contract of employment that sets out job responsibilities, pay and the expected hours of work. As part of our initiative to identify and mitigate risk we ensure that all staff are appropriately vetted and that all are paid via bona fide bank accounts and no payments made in cash.

We understand that the following areas give rise to the highest modern slavery risks:

- Working in the contracting industry
- Use of site operatives on client projects including unskilled labour
- Materials produced overseas

We also 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
- Protect whistle blowers

### Supplier Adherence to our Values and Ethics

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. This consists of:

- Rigorous procurement standards and supplier onboarding
- Annual review of our suppliers
- Ensuring clauses regarding modern slavery are included with third parties, including customers and suppliers

### Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

### Our Effectiveness in Combating Slavery and Human Trafficking

We 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:

- Annual review of our suppliers
- We received no reports of any indices of modern slavery in 2021 within our own business or our supply chain, and therefore no investigations or remedial activities were required

### Planning Ahead

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Training of employees
- Reviewing supplier onboarding processes
- Ensuring contractual obligations are included in all our agreements

*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 year ending 31st December 2022. It was approved by the board of directors of Delton Power Limited on 19<sup>th</sup> January 2023.*



**Josh Brown**

Director - Delton Power Limited