

Power & Infrastructure Resourcing Modern Slavery Act Compliance Statement 2019-2020

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015 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 31 March 2020. 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.

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.

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 2019, no concerns were made related to modern slavery. Any issues raised and actions taken are reported to the SPL Board of Directors.

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. 140M GBP.

Our People

We have taken action to prevent modern slavery and human trafficking in our own business. 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 managers 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.

This year we have placed a larger emphasis on supplier management by increasing the resource of the supply chain team. SPL's supply chain team worked with our suppliers' customer service teams, engineering teams, quality teams and supply chain teams to ensure that our principles were aligned.

We reviewed our supplier approval process and ensured it was working in parallel with our other business systems; underpinned by our risk-based thinking approach.

Our 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 have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our Modern Slavery and Human Trafficking Policy 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 have put in place the following responsibilities:

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.

- 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 - Human Resources 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: 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: Human resource 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. has, in the last 12 months gone through a major transition and the business has reviewed and updated its agreements with suppliers to ensure compliance with anti-slavery measures.

We have a dedicated team, which consists of representatives from the following departments:

- Legal
- Assurance
- Human resources
- Procurement
- Health & Safety

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 intend to undertake training to appropriate staff. We also require our business partners to provide training to their staff and suppliers and providers.

Our effectiveness in combating slavery and human trafficking

Throughout the year we have monitored our supply chain effectively to safeguard against our business partners impacting our organisation negatively. We have done this via our internal audit programme.

This Modern Slavery Statement will be regularly reviewed and updated as necessary.

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

- SPL Powerlines UK Ltd

- Power & Infrastructure Resourcing Ltd

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

Name: Günter Kielmayer and Martin Hawley

Position: Managing Directors

Date: 22 January 2020

Signature:

