# The Modern Slavery Act
# Anti-Slavery and Human Trafficking Policy Statement

Modern slavery is the illegal exploitation of people for personal or commercial gain. Victims are controlled by force, threat, coercion and deception. It can take various forms including trafficking of people, forced labour, sexual or criminal exploitation or domestic servitude.

Network Plus is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour (collectively "human trafficking and slavery"). It also strongly believes that it has a responsibility for promoting ethical and lawful employment practices.

Accordingly, we will not knowingly use unlawful child labour or forced labour in any of the utilities and/or other commodities, products and/or services it provides, nor will it accept commodities, products and/or services from suppliers that employ or utilise child labour or forced labour.

**Our commitment**
Modern slavery is a criminal offence and a violation of fundamental human rights. Network Plus is committed to doing all that we reasonably can to prevent all forms of modern slavery in any part of our business and supply chain.

We expect our people, customers and supply chain to share and uphold these ethical values and principles.

We operate a zero-tolerance approach to modern slavery and are committed to implementing effective systems and controls to safeguard against any form of modern slavery occurring within our organisation or supply chains.

This policy applies to all employees (permanent, fixed-term, and temporary), directors and officers, agency workers, contractors and consultants, suppliers and sub-contractors, and any third party acting on behalf of the Company.

**Our Business**
We directly employ over 2,500 colleagues across England and support an extensive supply chain; and work on behalf of our clients to build and maintain critical national infrastructure across England and Wales.

**Policies and contractual provisions**
Our commitment to conducting business ethically and responsibly is reinforced throughout various company policies:

Anti-Slavery and Human Trafficking Policy
This policy reflects relevant legislation and recognised best practice across the sector. It is published on our internal intranet and is easily accessible to all employees. The policy clearly defines modern slavery, including its various forms, and sets out our commitments as an employer. It also outlines our expectations of third parties with whom we engage, highlights key warning indicators, and explains the process for reporting concerns.

Whistleblowing Policy
We encourage our employees, supply chain partners, and members of the public to report any activity that appears improper or unethical, including potential human rights violations. We provide access to an independently operated platform offering a confidential, 24-hour reporting service via telephone or email. Individuals may submit reports anonymously if they prefer.

Contracts and Procurement Policies
Our contracts and procurement policies are designed to promote a sustainable supply chain and generate long-term social value, supporting a more inclusive and diverse industry. These policies strengthen awareness of human rights issues and use insights gained to drive continuous improvement.

Our procurement contracts require suppliers to comply with the Modern Slavery Act 2015, our Anti-Slavery and Human Trafficking Policy, and other applicable policies. Suppliers must also undertake appropriate due diligence within their own supply chains and make reasonable efforts to avoid sourcing raw materials, resources, or products from organisations that engage in forced labour.

**Governance and Responsibility**
The Board of Directors has overall responsibility for ensuring compliance with this policy and the Modern Slavery Act 2015. Operational responsibility for implementation sits with each divisional Managing Director.

Responsibilities include conducting risk assessments, ensuring due diligence, monitoring supplier compliance, delivering training, and overseeing annual reporting (where required).

Reports and issues dealt with in FY25
We can confirm that there were no allegations of potential modern slavery in FY25.

This statement describes the steps that we have taken during the year ending 31 March 2025 to prevent modern slavery and human trafficking in our organisation and our supply chain.

**Risk Assessment**
We assess the risk of modern slavery within our workforce, recruitment practices, supply chains, high-risk geographies, and high-risk sectors.

Risk assessments are conducted annually and when entering new markets or engaging new suppliers.

We believe the highest potential risk sits within our supply chain. Most of our products and services are purchased from UK or EU based firms who are also required to comply with the requirements of the UK Modern Slavery Act, 2015 or similar legislation in EU states. A significant number of products are purchased through our supply chain, whose Supplier Code of Conduct includes a provision around forced labour.

**Due Diligence Processes**
We operate a clear due diligence process for the assessment of modern slavery risks:

Supplier Due Diligence:

- Supplier onboarding questionnaires
- Supplier Code of Conduct
- Contractual compliance clauses
- Right-to-audit provisions
- Risk-based audits where appropriate

Employment Controls:

- Right-to-work checks
- Written employment contracts
- Direct payment of wages
- Transparent wage practices
- No recruitment fees charged to workers

Ongoing Monitoring:

- Periodic supplier review
- Incident reporting mechanisms
- Internal compliance audits

Whilst we believe that the risk of modern slavery is low, we ask for more information about the steps our suppliers are taking to mitigate this risk during procurement. These responses provide us with confidence that each supplier is committed to tackling modern slavery within their organisation and their supply chain.

**Supplier Code of Conduct**
All suppliers must comply with applicable anti-slavery laws, prohibit forced labour and human trafficking, ensure workers are free to leave employment, pay lawful wages, provide safe working conditions, and respect freedom of association.

Non-compliance will result in corrective action plans, suspension, or termination of contracts.

**Reporting Concerns**
Employees and third parties may report concerns via line management, HR, Compliance, or our external whistleblowing channel provided by Vista.

**Training and Awareness**
The Company provides training to senior management, procurement teams, HR personnel, and supply chain staff. Training includes recognising indicators of modern slavery, understanding legal obligations, reporting procedures, and risk assessment techniques. Training is delivered to all managers as part of their induction, with refresher training completed as required.

**Key Performance Indicators**
Effectiveness of this policy is measured by:

- Percentage of suppliers assessed
- Number of audits conducted - Training completion rates
- Reported incidents and outcomes
- Corrective action implementation rates

**Remediation**
Where risks are identified, the Company will investigate promptly, implement corrective action, support affected individuals where appropriate, escalate to authorities if necessary, and terminate supplier relationships if remediation fails.

**Transparency Statement**
If annual turnover exceeds £36 million, the Company will publish an annual Modern Slavery Statement approved by the Board, signed by a Director, and published prominently on its website.

The Statement will address organisational structure, policies, due diligence processes, risk management, effectiveness measures, and training.

**Review and Monitoring**
This policy will be reviewed annually or following significant legal or operational changes.

**Approval**
Approved by the Board of Directors of Network Plus Services Limited.

Signed:



Kevin Fowlie
Chief Executive Officer