

Modern Slavery Statement

At PFP Energy, we are committed to preventing slavery and human trafficking in our business and supply chain, in accordance with the UK Modern Slavery Act.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which include the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery with a commitment to act ethically and with integrity in all our business dealings and relationships. We are focused on implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

We are also committed to being transparent in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers, and other business partners. As part of our contracting processes we raise specific prohibitions against the use of forced, compulsory or trafficked labor which includes anyone, at any age, held in slavery or servitude. There is also an expectation that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity including; employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, suppliers, third-party representatives, and business partners.

Responsibility

As a company we have a responsibility to ensure all workers are safeguarded, treat fairly and with dignity.

Everyone must observe this policy and be aware that turning a blind eye is unacceptable and not an option.

We will:

- Maintain clear policies and procedures preventing exploitation and human trafficking, protecting our workforce and reputation.
- Be clear about our recruitment policy.
- Check supply chains.
- Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc. to ensure we know who is working for us.
- Ensure an open and transparent grievance process for all employees is in place.
- Seek to raise awareness so that colleagues know what we are doing to promote their welfare.
- Make a clear statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to employees and clients seriously.

Managers will:

- Listen and be approachable to colleagues.
- Respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation.
- Remain alert to indicators of slavery.
- Raise the awareness of colleagues by discussing issues and providing training so that everyone can spot the signs of trafficking and exploitation and know what to do.
- Use their experience and professional judgement to gauge situations.

All colleagues have responsibilities under this policy and whatever role or seniority they must:

- Be aware – if they suspect someone is being controlled or forced by someone else to work or provide services, follow reporting procedure.
- Follow the reporting procedure if a colleague tells them something they think might indicate they or someone else is being exploited or ill-treated.
- Tell us if they think there is more we can do to prevent people from being exploited.

Compliance

Employees must ensure they read, understand, and comply with this policy. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If an employee believes or suspects a breach of this policy has occurred or that it may occur, they must notify their manager or report it in accordance with the Company's Whistleblowing Policy as soon as possible.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Communication

Training on this policy, and on the risk our business faces from modern slavery in its supply chains will be provided, as necessary.

Our zero-tolerance approach to modern slavery will be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Due Diligence

We undertake due diligence when considering new suppliers and regularly review our existing suppliers. The due diligence process includes building long-standing relationships with suppliers and making clear the expectations of business partners. The modern slavery and human trafficking risks will be evaluated for each new supplier and sanctions, including business termination, will be invoked against those that fail to improve their performance.

Identifying Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- The person is not in possession of their own passport, identification, or travel documents.
- The person is acting as though they are being instructed or coached by someone else.
- They allow others to speak for them when spoken to directly.
- They are dropped off and collected from work.
- They are withdrawn or appear frightened.
- They do not seem to be able to contact friends or family freely.
- They have limited social interaction or contact with people outside their immediate environment.

Please note, this list is not exhaustive. Someone displaying some of the above may not necessarily be a victim of slavery or human trafficking however they may indicate if something is not quite right. If anyone is suspicious, we encourage them to report it.

Reporting Slavery

Talking to someone about a concern may stop someone else from being exploited or abused. If a colleague thinks that someone is in immediate danger, they should call 999. Otherwise, they should discuss any concerns with the Managing Director who will decide a course of action and provide further advice.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of immediate danger, you speak to the HR before taking any further action.

Breaches of Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy. We are committed to improving our practices to combat slavery and human trafficking.