

# MODERN SLAVERY ACT 2015

**ENERVEO LIMITED STATEMENT 2022/23** 

#### INTRODUCTION

Enerveo Limited remains fully committed to compliance with the Modern Slavery Act 2015 ("Act") not only in its own dealings but in those of its supply chain. This financial year (2022/23) the Group worked hard to manage the operational impact from sale from SSE PLC to Aurelius Group and continued to offer support to our customers, people, and communities and we have continued to take action to tackle slavery and human trafficking in our business and supply chain.

This statement has been published in accordance with the Act and sets out the steps we have taken to prevent slavery and human trafficking in our business and supply chain. The information contained within relates to the Group's position for the financial year ending 2023.

This statement has been approved by the Board of Directors

Signed

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ZAK HOULAHAN Chief Executive Officer Enerveo Limited.

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# **Modern Slavery Statement**

#### **Organisation structure**

At Enerveo Limited (formerly SSE Contracting) we have recently undertaken a rebrand after being sold by SSE PLC to Aurelius Group and are currently developing our own policies and procedures that fit with the Enerveo way of working. We currently have around 1500 employees and operate in the electrical and mechanical contracting space within the UK and Ireland. We have previously complied with all of SSE's modern slavery statements; however, this is now our first under the Enerveo brand name.

# **Compliance with Modern Slavery act 2015**

We are fully committed to ensuring there are no incidences of modern slavery within the business, within our supply chain and with any partners we work with. This is primarily done through two main policies we have in place; our Procurement policy and our Human Right policy.

The main points from the policies which adhere to the modern slavery act are as follows:

- Confirms we have zero tolerance towards all occurrences of modern slavery in our business and in our supply chain;
- To support and be fully committed to upholding Human Rights International Standards and Legislation including modern slavery;
- The inclusion of a modern slavery clause in all new contracts requiring suppliers to address the risk of human rights abuse in relation to Enerveo's activities;
- We comply with the Modern Slavery Act 2015 and publish an annual Modern Slavery Statement outlining the actions it has taken to address modern slavery, available on our company website;
- Raising Human Rights awareness to our Employees and ensuring understanding of modern slavery and the potential risks in our direct operations and supply chain through mandatory e-learning;
- Assessing our direct and supply chain operations for the risk of modern slavery and human rights abuses and works to mitigate any risks that may emerge.

#### Activities undertaken in the last year to address modern slavery

It is Enerveo Limited's policy to not knowingly conduct business with those engaged with slavery and human trafficking and to cooperate with enforcement bodies in relation to investigations carried out by them in relation to slavery and human trafficking when required to do so.

Our Procurement Policy lays out our zero-tolerance approach to modern slavery in all forms with our own business and that of our supply chain. It provides for internal and external awareness of the Modern Slavery Act 2015, as well as the standards we expect from our supply chain. Our new supplier onboarding processes clearly identify the need for compliance with the Act as a mandatory part of doing business with us.

We expect our suppliers and contractors to cascade our zero-tolerance approach to include:

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- The illegal use of forced or slave labour, servitude, human trafficking, debt bondage, forced or servile marriage, descent-based slavery, child labour or forced labour;
- Ensuring overall terms of employment are voluntary and the right to freedom of association and collective bargaining must be respected;
- Following all local, applicable laws pertaining to minimum age requirements, wages, the number of hours worked in a seven-day week, overtime, and benefits;
- Ensuring all materials incorporated into their products comply with the laws regarding human trafficking and slavery in the country or countries in which they carry on business and be able to demonstrate compliance with this requirement if requested to do so.

Furthermore, internally within in our business, we have implemented a new payroll system this year which completes monthly minimum wage checks to ensure no one falls below this threshold. Further to this, our payroll team undergo external audits which randomly checks a selection of our employees payslips to again ensure compliance. We work with Sterling who conduct ID checks, right to work checks and DBS checks to ensure employees are compliant with UK law and suitable for the role. We have also commitment to the living wage foundation which not only ensures all of our employees are paid the living wage, it ensures our supply chain are also paying their staff and contractors the minimum wage. As part of the commitment, we are obligated to only work with suppliers and contractors who confirm to us they pay the living wage and this is confirmed through the tender/bidding process

Our HR and our Training and Development team provide mandatory e-learning for all employees to complete on Modern Slavery and the 2015 act every 12 months. Finally, we have a whistleblowing procedure in place to ensure if there are any concerns, these are raised and handled confidentially, anonymously and are fully investigated.

# Plan for next year

Our commitment to Modern Slavery will continue to progress over the years and our plan for next year is as follows:

- 1. Develop means, deliver measurements, and report performance to our SMT on a monthly basis on the effectiveness and impact of our activities in this area;
- 2. Roll out access to the Enerveo MSA 2015 e-learning tool kit to our supplier base;
- 3. Increase MSA 2015 awareness training for all members of the Enerveo Procurement team, creating a team of informed professionals equipped to identify and flag areas of concern
- 4. Implement our new LMS system with more in depth e-learnings on Modern Slavery

Enerveo Limited's Modern Slavery Statement can be found on our internal company site and our external home page.

Zak Houlahan (CEO)

Enerveo Limited

November 2022.