



VITAL ENERGi UTILITIES LIMITED SLAVERY & HUMAN TRAFFICKING POLICY SIGNED STATEMENT

Vital Energi is fully committed to compliance with the Modern Slavery Act 2015 (the "Act") in all its divisions, not only in its own dealings but in those of its supply chain. We have taken several steps to combat slavery and human trafficking and will continue to work to ensure this does not occur in our business or 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 chains.

OUR POLICIES: Vital Energi has a number of policies and practices that are based on ACAS code of practice and human rights standards. These set out our position of zero tolerance of modern slavery and human trafficking in any form in our business and supply chain. We are committed to acting ethically and with integrity in our business dealings and relationships and to maintaining systems and controls designated to ensure modern slavery and human trafficking are not taking place in our business or across our supply chain. Our Whistleblowing Policy provides a mechanism for our employees and others in our supply chain to report suspected breaches of these policies.

OUR APPROACH TO ASSESSING AND MANAGING RISK:

- Our policies require that our sub-contractors and suppliers acknowledge their responsibility for adhering to our policies.
- We have undertaken risk assessments to enable us to apply a risk-based and proportionate approach to dealing with anti-slavery and human trafficking issues.
- We have issued minimum procurement standards for materials and products against certain identified risk categories.
- Our contractual terms include obligations on our sub-contractors and suppliers to comply with our policies, including our Anti-slavery and Human Trafficking Policy.
- Our QA policies and procedures incorporate Anti-slavery and Human Trafficking compliance.
- We engage with our supply chain to obtain the necessary assurances.
- We are supporting the development of targeted training for those involved in procurement and/or with responsibility for supply chain management.

We are aware that risks presented from the modern slavery and human trafficking can occur anywhere in our operations, whether through direct employment, sub-contracted employees or the supply of materials. We expect our suppliers and subcontractors to ensure that there is no slavery or human trafficking in their supply chain and where issues are identified (including through our audit process) that are not resolved to our satisfaction, we will review the on-going nature of the relationship with that relevant organisation.

NEXT STEPS: We will continue to monitor the effectiveness of our actions against modern slavery and human trafficking.

Next steps will include:

- Continuing to develop further standards to support our Anti-slavery and Human Trafficking Policy (and related policies)
- Keeping our pre-qualification standards for the appointment of new suppliers and subcontractors under review.
- Continue to train employees on identifying any potential issues within our operations and supply chain.
- Updating the assessment of risk of modern slavery in our business and our supply chain.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Vital Energi's modern slavery and human trafficking statement for the financial year ending 31 July 2018.

Gary Fielding
Joint Managing Director
Date: August 2018

Ian Whitelock
Joint Managing Director
Date: August 2018

KEY QUOTE

"Vital Energi is committed to social and environmental responsibility and has zero tolerance for anti-slavery and human trafficking"

GARY FIELDING &
IAN WHITELOCK,
JOINT MANAGING
DIRECTORS

The original signed copy of this document is retained by the SHEQ Department
Date Reviewed: 17th August 2018.