



ESP UTILITIES GROUP LTD

MODERN SLAVERY STATEMENT

Document Summary

- The document is the Modern Slavery Statement published by ESP Utilities Group Ltd
- Organisation and Structure: ESP Utilities Group Ltd (ESPUG) is an Independent Gas Transporter, Independent Distribution Network Operator, Energy Services Company (ESCO) providing end-to-end management for heat networks and provides Water and Wastewater Services in the UK. It employs around 170 staff and was established in 2000, acquired by 3i Managed Infrastructure Assets in 2017
- Policies and Supply Chain: ESPUG has policies on conduct and behaviour, corporate social responsibility, anti-bribery, equal opportunities, whistleblowing, and supplier selection and management. The supply chain involves around 60 accredited Independent Connection Providers, Utility Infrastructure Providers, and Self Lay Providers, all based in the United Kingdom (UK).
- Due Diligence and Risk Assessment: ESPUG conducts due diligence on new and existing suppliers, assessing risks, auditing health and safety standards, and ensuring compliance with anti-corruption and anti-modern slavery laws. The risk of modern slavery in our supply chain is considered low.
- Actions and Awareness: ESPUG increases transparency through tendering processes, updates terms and conditions, and has a Contract Management Framework. We provide awareness training on modern slavery and ethical employment practices to staff and ensure suppliers are aware of this stance.
- Commitment and Risk Management: ESPUG commits to monitoring the risk of slavery in its supply chain, reviewing corporate policies, and not engaging organizations involved in slavery. We have identified key risks and mitigation strategies, including regular training and policy updates.

OBJECTIVE

This statement is prepared by ESP Utilities Group Limited (ESPUG) (Registered Company Number 02612105) pursuant to section 54 of the Modern Slavery Act 2015 (the Act) and applies to all ESPUG subsidiary and affiliate companies. It is our slavery and human trafficking statement for the financial year ended 31 December 2026. This document is published on our website and is available on request.

Our Organisation and its Structure

ESPUG is a leading Independent Gas Transporter (IGT), Independent Distribution Network Operator (IDNO), Energy Services Company (ESCO) providing end-to-end management for heat networks and provides Water and Wastewater Services in its capacity as a New Appointments and Variations (NAV). Our primary business is the adoption of utility assets to new housing networks in Great Britain. Additionally, ESPUG adopts networks connecting industrial and commercial sites and Electric Vehicle charging infrastructure.

ESPUG operates solely in the UK and employs around 170 staff, the majority of whom are based at our head office in Leatherhead, Surrey.

ESPUG was established in 2000 and was acquired by 3i Managed Infrastructure Assets in 2017. The group companies, to whom this statement applies, are:

- ES Pipelines Ltd 03822878
- ESP Electricity Ltd 04718806
- ESP Water Ltd 13495621
- ESP Water Retail Ltd 13494724
- ESP Heat Limited 17037035
- ESP IDNO Limited 17142222
- ESP Billing Limited 17142224

Our Policies

ESPUG is single-minded in its approach to being a model corporate citizen and we have clear policies in place which demonstrate our commitment to promoting best practice in employment and combating modern slavery and human trafficking risks, all of which are available on request. We have policy and frameworks covering:

- Employee Conduct and Behaviour;
- Corporate Social Responsibility;
- Anti-Bribery;
- Equal Opportunities;
- Whistleblowing;
- Supplier Selection and Management;
- Governance;
- Environmental, Social and Governance reporting.

Our Supply Chain

ESPUG's supply chain involves several counterparties the majority of which consist of National Electricity Registration Scheme (NERS), Gas Industry Registration Scheme (GIRS) and Water Industry Registration Scheme (WIRS) accredited Independent Connection Providers (ICP's), Utility Infrastructure Providers (UIP's) and Self Lay Providers (SLP's), respectively, who install the physical infrastructure which we adopt under our Licences.

ESPUG currently works with approximately 60 ICPs, UIPs and SLPs, all of whom are based in, and carry out work for ESPUG, exclusively in the UK.

Supplier due diligence

ESPUG conducts due diligence on all new suppliers during on-boarding and on existing suppliers at regular intervals. This includes (but is not exclusive to):

- Assessing risks in the provision of particular services;
- Auditing the suppliers, and their health and safety standards;
- Sanctioning suppliers that fail to improve their performance in line with our requirements; and
- Ensuring Suppliers' have policies in place providing for their compliance with all applicable laws and regulations including anti-corruption and anti-modern slavery

ESPUG exercises control only over those organisations with which it has direct contractual relationships. All ESPUG's contractual arrangements contain clauses requiring counterparties to comply with all relevant employment legislation.

Risk Assessment

ESPUG works exclusively in the United Kingdom, and it is our assessment that the risk of slavery, child labour or human trafficking occurring in our supply chain is low. Our Shipper and Energy Supplier customers are, largely, blue chip companies and have each published their commitment to comply with ethical employment practices on their websites. We foster long-term, close relationships with our suppliers and contractors so that we can be confident of their employment practices.

Our Actions

ESPUG

- has increased transparency in its supply chain, by making greater use of tendering processes for the services it procures and outsources;
- continually monitors its existing terms and conditions with a view to identifying any updates necessary to comply with current regulatory and legal requirements and ensure continued compliance; and
- has a Contract Management Framework, which complements and reinforces the application of its Supplier Management Policy and support adherence to the Modern Slavery Act.

Awareness

ESPUG will continue to raise awareness of modern slavery issues by:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking.
- ensuring staff involved in engaging suppliers are aware of and follow [modern slavery guidance on https://www.gov.uk/government/publications/procurement-policy-note-0519-tackling-modern-slavery-in-government-supply-chains](https://www.gov.uk/government/publications/procurement-policy-note-0519-tackling-modern-slavery-in-government-supply-chains)
- continuing to take action to embed a zero-tolerance policy towards modern slavery.
- ensuring that staff involved in engaging suppliers and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices.
- mapping our Supply Chain with a view to better understanding the risks of Modern Slavery associated with our operation.
- carrying out due diligence and sharing best practices with our Supply Chain partners, in keeping with the identified risks.

- implementing metrics to measure the management of the risk of Modern Slavery in our business.

Our Commitment

ESPUG commits to keeping its corporate policies under review and to monitoring the risk of slavery or human trafficking in its supply chain. It further commits to reviewing its procurement framework to ensure that clauses specific to good employment practices can be introduced into its contracts.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

We will not enter into business with any organization which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Appendix 1 – Risk Assessment

The risk of Modern Slavery within ESPUG and its Supply Chain is considered to be low given the location, sector and engagement with our Customers.

The key risks identified have been set out below and scored in line with our business risk methodology.

Risk Number	Date Raised and Owner	Risk Category & Description	Description of Risk(s)	Likelihood	Impact	Raw Risk Score	Planned mitigation(s)	Likelihood	Impact	Residual Risk Score	Review Frequency	Control Status
1	VS	Regulation / Legislation	Lack of awareness of Modern Slavery and guidance internally results in risk factors going undetected	2	2	4	<p>Introduce regular training for all staff.</p> <p>Ensure this policy is included as part of employee onboarding.</p> <p>Remind staff annually of the policy and any updates to it.</p> <p>Ensure the Modern Slavery Statement is available on the ESPUG Intranet as well as public facing websites.</p>	1	2	3	Annual	↕
2	VS	Regulation / Legislation	Lack of awareness of Modern Slavery risks and ESPUG stance externally results in unsafe behaviours going unchallenged.	2	2	4	<p>Continue work to include Modern Slavery clauses in all ESPUG contracts.</p> <p>Ensure all Suppliers and Customers are aware of and have access to our Statement.</p> <p>Introduce discussion of Modern Slavery in regular Operational Competency reviews with Customers.</p> <p>Include requirement for Operations Engineers to record observations regarding Modern Slavery risks when conducting site visits.</p>	1	2	3	Annual	↕