



ESP UTILITIES GROUP LTD

MODERN SLAVERY STATEMENT

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1.1	29/06/2017	Robert Wallace	Reviewed & Approved	All
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1.2	07/06/2018	Thomas Butler	Published	All
1.3	19/02/2019	Vicki Spiers	Reference to Child Labour included	ESP Supply Chain
1.4	14/01/2020	Vicki Spiers	Annual Review	N/A
1.5	11/12/2020	Elise Whittaker	Annual Review	N/A

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 companies. It is our slavery and human trafficking statement for the financial year ended 31 December 2017. 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) and independent distribution network operator (IDNO). Our primary business is the adoption of utility assets to new housing networks in Great Britain. We also adopt networks connecting industrial and commercial sites, and urban pockets surrounded by gas mains where homes were originally designed to be heated by a different fuel.

ESPUG operates solely in the UK and employs around 90 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 Networks Ltd 02865198:
- ESP Pipelines Ltd 03405272:
- ESP Connections Ltd 03234745: and
- ESP Electricity Ltd 04718806.

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, all of which are available on request. Such ESPUG policies include:

- Corporate Social Responsibility Policy;
- Anti-Bribery Policy;
- Equal Opportunities Policy;
- Whistleblowing Policy; and
- Supplier Selection Policy.

Our Supply Chain

ESPUG’s supply chain involves several counterparties. These majority of ESP’s supply chain are NERS and GIRS accredited Independent Connection Provider (“ICP”) and Utility Infrastructure Providers (“UIP”), respectively, who install the physical infrastructure which we adopt under our Licences. ESPUG currently works with approximately 60 ICPs and UIPs, all of whom are based in, and carry out work for ESPUG, exclusively in the UK. ESPUG carries out due diligence on the direct counterparties in its supply chain to ensure that suppliers meet our high ethical standards of behaviour. ESP exercises control only over those organisations with which it has direct contractual relationships and, sub-contracts attaching to those direct contractual relationships. All ESP’s contractual arrangements contain clauses requiring counterparties to comply with relevant legislation.

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 customers are, largely, blue chip energy supply 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;
- ESPUG is conducting a gap analysis of existing terms and conditions with a view to identifying the extent necessary to update to comply with current regulatory and legal requirements, and ensure continued compliance;
- ESPUG is developing and implementing a Contract Management Framework, which will complement and reinforce the application of its Supplier Selection Policy and support adherence to the Modern Slavery Act.

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 practise can be introduced into its contracts.