



ESP UTILITIES GROUP LTD

MODERN SLAVERY STATEMENT

Document Details			
Version	1.72	Classification	PUBLIC
Author	Business Operations Director (VS)		
Reviewed by	Chief Financial Officer (PM)	Last reviewed	July 2023
Approved by	Chief Executive (KO)	Approval date	07/06/2018
Review frequency	Every 12 months	Next review due	July 2024

Version history				
Version	Date	Author	Reason for new version	Sections affected
0.01	23/06/2017	Vicki Spiers	N/A	N/A
1.0	28/06/2017	Vicki Spiers	Published version	N/A
1.01	29/06/2017	Vicki Spiers	Review by Shareholders	All
1.1	29/06/2017	Robert Wallace	Reviewed & Approved	All
1.11	06/06/2018	Vicki Spiers	Review & Inclusion of Actions	All
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
1.6	30/11/2021	Elise Whittaker	Annual Review	N/A
1.7	27/07/2022	Vicki Spiers	Annual Review	All
1.71	05/09/2022	Vicki Spiers	Exec Feedback	Inclusion of Risk Assessment
1.72	25/07/23	Vicki Spiers	Annual Review	All

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 2022. 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), and provides Water and Wastewater Services. 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 Electric Vehicle charging infrastructure.

ESPUG operates solely in the UK and employs around 120 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
- ESP Electricity Ltd 04718806
- ESP Water Ltd 13495621
- ESP Water Retail Ltd 13494724

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 frameworks covering:

- Conduct and Behaviour
- Corporate Social Responsibility
- Anti-Bribery
- Equal Opportunities
- Whistleblowing , and
- Supplier Selection

Our Supply Chain

ESPUG’s supply chain involves several counterparties.

The majority of ESP’s supply chain consist of NERS, GIRS and WIRS accredited Independent Connection Providers (“ICP”), Utility Infrastructure Providers (“UIP”) and Self Lay Providers (“SLP”), 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:

- 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.

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;
- ESPUG 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;

ESPUG has a Contract Management Framework, which complements and reinforces the application of its Supplier Selection 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.
- map our Supply Chain with a view to better understanding the risks of Modern Slavery associated with our operation
- carry out due diligence and share best practice with our Supply Chain partners, in keeping with the identified risks
- implement 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	Date Raised and Owner	Risk Category & Description	Description of Risk(s)	Likelihood	Impact	Raw Risk Score	Planned mitigation(s)	Likelihood	Impact	Residual	Review Frequency	Control
1	VS	Regulation / Legislation	Lack of awareness of Modern Slavery and guidance internally results in risk factors going undetected	2	2	4	Introduce regular training for all staff. Ensure this policy is included as part of employee onboarding. Remind staff annually of the policy and any updates to it. Ensure the Modern Slavery Statement is available on the ESPUG Intranet as well as public facing websites.	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	Continue work to include Modern Slavery clauses in all ESPUG contracts. Ensure all Suppliers and Customers are aware of and have access to our Statement. Introduce discussion of Modern Slavery in regular Operational Competency reviews with Customers. Include requirement for Operations Engineers to record observations regarding Modern Slavery risks when conducting site visits.	1	2	3	Annual	↕