

Introduction

This policy is designed to clarify and provide guidance on Rochester Utilities Ltd.'s position on legislation relating to anti-bribery and corruption at work and the recognition of its duty to under the Modern Slavery Act (2015). Rochester Utilities Ltd are committed to ensuring that there is no modern slavery or human trafficking in our operations or supply chain. Our Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Scope

This Modern Slavery & Human Trafficking Policy applies to all workers, associated persons and/or third parties associated with Rochester Utilities Ltd, and any arrangements made are subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

General Principles

It is Rochester Utilities Ltd's approach that:

- Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Rochester Utilities Ltd has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- Rochester Utilities Ltd is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

Compliance with the Policy

You must ensure that you read, understand, and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager OR the Project Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or the Project Manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the Project Manager.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Office Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Communication and Training

Communication and the training on this policy, forms part of the induction process for all individuals who work for us, training will be provided as part of the Rochester Utilities Ltd induction process, with refresher training taking place annually.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breach of the Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and Company's working on our behalf if they breach this policy.

Responsibility for the Policy

Rochester Utilities Ltd 's Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The IMS Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective.

Management, at all levels, are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training. You are invited to comment

on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the IMS Manager.

Review

Rochester Utilities Ltd will review policies and procedures periodically to reflect changes in legislation, good practice etc. This Policy shall be reviewed, at a minimum, annually as part of Rochester Utilities Ltd Management Review process, for its continuing adequacy and suitability.