

Modern Slavery Statement

INTRODUCTION

We are committed to preventing acts of modern slavery and human trafficking from occurring within our business and supply chain and impose the same high standards on our suppliers

BUSINESS STRUCTURE

Leep Utilities owns and operates regulated and non-regulated multi-utility networks across the UK. Our capabilities cover the adoption and ongoing stewardship of electricity, water and wastewater, heating, cooling and hot water networks.

To serve our customers and operate our business, we work with a range of suppliers supporting our corporate operations and the construction, operation and maintenance of our networks.

POLICIES

Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all business dealings and relationships, and to maintaining effective systems and controls to prevent modern slavery in our business and supply chains.

Our approach is supported by the following policies and standards:

- Modern Slavery Policy
- Whistleblowing Policy
- Equal Opportunities Policy
- Grievance Policy and Procedure
- Supplier Code of Conduct

DUE DILIGENCE

We check our supply chains to reduce the potential for slavery and human trafficking. Suppliers are expected to take modern slavery seriously and maintain appropriate controls.

We require suppliers to agree to our Supplier Code of Conduct, enter into supplier contracts containing a modern slavery clause, and confirm that they comply with and maintain the policies and standards set out above.

Our supplier validation procedures are designed to:

- establish and assess potential risk areas in our business and supply chains;
- monitor potential risk areas;
- reduce the risk of slavery and human trafficking occurring; and
- provide adequate protection for whistle-blowers.

RISK & COMPLIANCE

We do not consider that we operate in high-risk sectors or locations because we do not directly operate within identified high-risk areas. We nevertheless recognise that modern slavery risk can arise in any business or supply chain and take steps with our suppliers to identify and mitigate potential risks. Where a potential risk is identified, we investigate and take appropriate action. We do not tolerate slavery or human trafficking within our operations or supply chains.

RECRUITMENT AND NEW STARTERS

Our People & Culture team uses reputable recruitment agencies. Where an agency supplies an individual to carry out work for us while remaining employed by the agency, we require confirmation that appropriate checks have been completed, including the individual's right to work in the UK. All new joiners receive a written contract of employment ahead of their start date. We check that they are legally able to work in the UK and that they have not paid direct or indirect fees to obtain work. We also provide information on statutory rights, including sick pay, holiday pay and other applicable benefits.

MEASURING EFFECTIVENESS & MONITORING

We review our supplier validation process, forms, policies and procedures annually to evaluate the nature and extent of our exposure to modern slavery risk. We also monitor supplier adherence to our Supplier Code of Conduct and Modern Slavery Policy, investigate potential risks and take appropriate action where required.

During the next reporting period, we will continue to review the effectiveness of these controls and identify opportunities to strengthen our approach.

TRAINING

As part of our annual essential learning cycle, all colleagues receive training on modern slavery and how to report concerns. Colleagues are also required to read the Modern Slavery Policy and attest that they understand its content.

Managers are expected to remain alert to indicators of exploitation, respond appropriately to concerns and help colleagues understand how to spot and report potential trafficking or exploitation.

REPORTING CONCERNS

We encourage anyone with a genuine concern about modern slavery in our business or supply chains to raise it promptly. Concerns may be reported to our People & Culture team or under our Whistleblowing Policy. Those raising genuine concerns in good faith will be supported and will not suffer detrimental treatment, even if the concern is not substantiated.

If someone is in immediate danger, call 999. Concerns may also be raised with the Modern Slavery Helpline on 08000 121 700 or at modernslaveryhelpline.org, or with Protect on 0203 117 2520.

This statement was approved by the Board of Leep Holdings (Utilities) Limited.



Stephen Bradley
Chief Executive Officer

For and on behalf of Leep Holdings (Utilities) Limited

Date: 23/09/2026