

## Modern Slavery and Human Trafficking

This statement sets out AgilityEco's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within our business and our supply chain.

We recognise that it is our responsibility to take a robust approach to slavery and human trafficking. AgilityEco realises that slavery and human trafficking can occur in many forms, such as forced labour, child labour and workplace abuse. Therefore throughout this statement, we use the terms "slavery and human trafficking" to cover various forms of coerced labour.

AgilityEco is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Supplier take-on process and due diligence

Our services are designed to help businesses and public sector organisations manage rising energy bills through cost effective energy efficiency initiatives across residential and commercial properties. We embrace a flexible approach to project design and development, accessing financing and funding, as well as full programme delivery and compliance. Our business is diverse and offers a wide range of services across Great Britain. We deliver our services to high standards of integrity, honesty and fair dealing through our lean organisation.

AgilityEco works with a wide range of delivery partners across the supply chain. Our suppliers are integral to our continued success and it is essential that they conduct their business in a manner that supports this commitment to strong ethical standards and are best-in-class. All partners undergo a stringent verification and evaluation process to ensure there is no human trafficking or slavery of any form in our supply chain.

We set clear expectations for all suppliers and partners. To be a member of the AgilityEco partnership network, organisations will need to prove that they can meet with our ethical and service delivery standards as well as any required industry standards. We adopt a rigorous supplier take on process to ensure that any supplier we work with meets with our ethical and service delivery standards.

All suppliers are assessed on an annual basis as part of our overall supplier management process.

### Internal accountability

Accountability for AgilityEco's ethics and compliance lies with our senior leadership team. AgilityEco promotes honest and ethical conduct, with due consideration to the long and short-term impacts on human rights and the community when making business decisions. We encourage anyone (employees, contractors, suppliers, distributors and customers) to report in good faith on any concerns about unethical behaviour, human rights and legal violations and well as improper business practices such as fraud or bribery.

This is communicated on a regular basis via the senior leadership team to the whole company.

AgilityEco operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing policy:** AgilityEco encourages all workers, customers and other business partners to report any concerns related to the direct activities, or our supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

**Employee code of conduct:** Our code of conduct makes clear to employees the actions and behaviour expected of them when representing our organisation. AgilityEco strives to maintain the highest standards of employee conduct and ethical behaviour wherever it operates and managing its supply chain.

**Supplier code of conduct:** As stated above, we are wholly committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. AgilityEco works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.

**Recruitment policy:** AgilityEco uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency

We have reviewed our key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, we:

- Enhanced our system for supply chain verification, allowing us to further evaluate potential suppliers before they enter the supply chain
- Ensure our staff complete an online training course on modern slavery

AgilityEco's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline
- how to assess the risk of slavery and human trafficking in relation to various aspects of our business, including resources and support available
- how to identify the signs of slavery and human trafficking
- what initial steps should be taken if slavery or human trafficking is suspected

- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and the "Stronger Together" initiative
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

### **Awareness**

AgilityEco has raised awareness of modern slavery issues by explaining to employees:

- the basic principles of the Modern Slavery Act 2015
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

This statement has been approved by AgilityEco's senior leadership team who will review and update it annually.

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