

## Modern Slavery Policy

Mersey Rod Limited and RA Utility Solutions are committed to acting ethically and with integrity in all our organisational relationships within the UK. This Modern Slavery Policy outlines our dedication to complying with the Modern Slavery Act 2015 and our efforts to prevent and address modern slavery within our organisation and supply chain.

### Policy Statement:

Mersey Rod Limited and RA Utility Solutions strictly prohibit all forms of modern slavery, including servitude, forced labour, and human trafficking, within our organisation and supply chain. We are committed to ensuring that our systems, controls, and practices are effective in identifying and preventing any instances of modern slavery.

### Definitions:

For the purposes of this policy, the term "modern slavery" refers to the offences described in the Modern Slavery Act 2015, which include:

- Slavery
- Servitude
- Forced or compulsory labour
- Human trafficking.

### 1. Compliance with the Modern Slavery Act:

We fully comply with the requirements of the Modern Slavery Act 2015. We strive to create an environment where modern slavery has no place and work diligently to identify and address any risks within our organisation and supply chain.

### 2. Organisational Policies:

We have established various policies that contribute to minimising the risk of modern slavery and human trafficking. These policies include, but are not limited to:

- Code of Conduct: Our Code of Conduct sets out clear expectations for all employees, contractors, and business partners regarding ethical behaviour, human rights, and compliance with laws, including the prohibition of modern slavery.
- Recruitment and Employment Policy: Our recruitment and employment practices ensure that all individuals are treated fairly and lawfully, with no tolerance for forced labour or human trafficking.
- Supplier Code of Conduct: We expect our suppliers and business partners to adhere to our Supplier Code of Conduct, which explicitly prohibits the use of forced labour, child labour, and any form of modern slavery. We require them to implement similar standards within their own supply chains.

### 3. Due Diligence and Risk Assessment:

We conduct regular risk assessments of our organisation and supply chain to identify and evaluate the potential risks of modern slavery. We assess factors such as geographic locations, industry sectors, and previous incidents or allegations related to modern slavery. This enables us to implement appropriate measures to prevent and mitigate these risks.

#### **4. Training and Awareness:**

We provide training and awareness programs to our employees and relevant stakeholders to ensure they understand the risks and indicators of modern slavery. These programs emphasise the importance of vigilance, reporting mechanisms, and the actions to be taken if modern slavery is suspected or identified.

#### **5. Reporting and Whistleblowing:**

We maintain a confidential and accessible reporting mechanism that enables employees, suppliers, and other stakeholders to report any concerns or suspicions related to modern slavery. We treat all reports seriously, investigate them promptly, and take appropriate action in response.

#### **6. How to Report Modern Slavery Concerns**

Colleagues who suspect incidents or signs of modern slavery in the UK should:

- In the first instance, all modern slavery crimes should be reported to the local police by dialling 999.
- If colleagues hold information that could lead to the identification, discovery, and recovery of victims in the UK, they should contact the Modern Slavery Helpline 0800 0121 700.
- For more information, colleagues are advised to visit: [www.unseenuk.org](http://www.unseenuk.org)
- Alternatively, colleagues can make calls anonymously to Crimestoppers on 0800 555 111.

Colleagues who suspect incidents or signs of modern slavery *internationally* should:

- Contact: <https://www.antislavery.org/contact-us/> or other specialist anti-slavery organisations.
- If colleagues are abroad and think a person may be being exploited or have been trafficked, they should contact the embassy or consulate in the first instance for support.

#### **7. Continuous Improvement:**

We are committed to continuously improving our practices and systems to prevent and address modern slavery. We regularly review and update this policy to ensure its effectiveness, alignment with best practices, and compliance with legal requirements.

#### **8. Communication and Transparency:**

We communicate this Modern Slavery Policy to all employees, suppliers, and stakeholders and it is available to the public on our website. We aim to foster transparency, trust, and accountability in our efforts to combat modern slavery.

#### **9. Governance and Responsibility:**

The responsibility for implementing and overseeing this Modern Slavery Policy rests with the senior management team at Mersey Rod Limited and RA Utility Solutions. They provide the necessary resources, guidance, and support to ensure compliance with this policy and the effective prevention of modern slavery.

#### **10. Review:**

This policy will be reviewed periodically to ensure its ongoing relevance and effectiveness. Feedback and suggestions from employees, suppliers, and stakeholders are welcome and will be considered for future updates. By adopting and implementing this Modern Slavery Policy, Mersey Rod Limited and RA Utility Solutions aim to create an organisational culture

that leaves no room for modern slavery to thrive. We are committed to working collaboratively with our employees, suppliers, and stakeholders to eliminate modern slavery and uphold human rights.

We expect all employees to familiarise themselves with this policy and to actively support its implementation and objectives. Any employee who becomes aware of or suspects any form of modern slavery within the organisation or our supply chain has a responsibility to report it through the appropriate channels.

Mersey Rod Limited and RA Utility Solutions will investigate all reports of modern slavery promptly and thoroughly. If any instances of modern slavery are substantiated, we will take immediate action to remediate the situation, support affected individuals, and address the root causes of the issue. This may include terminating relationships with suppliers or taking legal action against those involved in modern slavery practices.

We are committed to maintaining accurate and transparent records to demonstrate our compliance with this policy. We will provide regular updates and reports to our stakeholders, as well as actively engage in dialogue with them regarding our modern slavery prevention efforts.

Mersey Rod Limited and RA Utility Solutions believe that the prevention of modern slavery requires ongoing collaboration, continuous improvement, and a collective commitment to ethical and responsible business practices. Together, we can contribute to a world free from the blight of modern slavery.

This policy is effective from 1/12/21 and will be regularly reviewed and updated as necessary to ensure its alignment with legislative changes and emerging best practices in the fight against modern slavery.

Jeremy Morton  
Director  
Mersey Rod Limited and RA Utility Solutions

i. Revised 03/01/2023  
ii. Revised 06/07/2023  
iii. Revised 08/01/2024