

# Anti-slavery and human trafficking Policy and Statement

## Policy Statement

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, agents, contractors and suppliers.

Unitspark Ltd strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing 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.

## Commitments

### Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

### Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk based approach we will also assess the merits of writing to suppliers requiring them to comply with our Code of Conduct, which sets out the minimum standards required to combat modern slavery and trafficking.
- Consistent with our risk based approach we may require:
  - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Code of Conduct
  - Suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code

- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationships

## **Approval for this statement**

This statement was approved by the Board of Directors on 1<sup>st</sup> July 2025

Ian Wallace (Managing Director)

Signature

A handwritten signature in black ink, appearing to read 'Ian Wallace', written over a vertical line that serves as a signature separator.

Date: 1<sup>st</sup> July 2025

# Slavery and Human Trafficking Statement

## What this policy covers

This policy applies to employees, workers and contractors.

Slavery and Human Trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

## Our business

Unitspark operates solely in the UK, manufacturing and installing engineering solutions to the Water Industry and within the Construction Industry. The majority of purchases are made from UK suppliers sources from our local area.

## Our Commitment

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.

## Due diligence processes for slavery and human trafficking

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk the Company has in place systems to encourage the reporting of concerns and the protection of whistleblowers.

Our supply chain providers are always with a UK provider and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

## Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

There is a Company induction where our policies, procedures and expectations are outlined.

## Our effectiveness in combating slavery and human trafficking

The Company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment.
- We require our supply chain to provide a copy of their Modern Slavery Policy or at least confirm they have taken the necessary steps to eradicate modern slavery within their business, pay their employees at least the national minimum wage and hold their own suppliers to account over modern slavery.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement.

## **Signature**

A signed copy will be displayed on the notice board and on the Company intranet.

## **Reporting suspicions of slavery**

You can report any suspicions of slavery either through the Company's Public Interest Disclosure (Whistleblowing) policy or externally to the Modern Slavery Helpline. Details are set out below:

<https://www.modernslaveryhelpline.org/>

08000 121 700.

## **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

## **Approval for this statement**

This statement was approved by the Board of Directors on 1<sup>st</sup> July 2025

Name (Managing Director) Ian Wallace

Signature



Date: 1<sup>st</sup> July 2025