



## Modern Slavery Statement

This statement is made by OCU Group Limited and its subsidiaries pursuant to section 54 of Part 6 of the UK Modern Slavery Act 2015. It sets out steps which we have taken during the financial year ending 30 April 2025 to mitigate the risk of modern slavery in our business and our supply chains.

### Introduction from the Chief Executive Officer

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, 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.

We have a zero-tolerance approach to modern slavery. 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 that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our approach to business is captured in our Code of Conduct which sets out the principles through which we seek to create a sustainable business for all our stakeholders, including our shareholders, clients, employees, suppliers and contractors, business partners, local communities and members of the public. We believe that sustainable growth is only possible in an environment which treats all stakeholders with respect and integrity and is fair, transparent and honest.

A key part of this is ensuring that we do not engage directly or indirectly in slavery or human trafficking, and this is a key priority for our executive management and our Board of Directors.

We are committed to ensuring that 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 of 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. We expect our suppliers to hold their own suppliers to the same high standards.

### Our Business and Organisation Structure

OCU Group Limited provides design, build, installation and maintenance services in the Energy, Utilities, and Digital Infrastructure markets. We operate throughout the UK & Ireland based from our Head Office in Manchester and through our national network of offices and operational premises.

As we grow our operations globally, we remain committed to upholding our responsibilities under the Modern Slavery Act and ensuring that robust safeguards are in place across all regions in which we operate.



## **Our Supply Chains**

We have a large supply base of suppliers, the majority of which are based in the UK and are geographically aligned to projects, supporting our ethos of engaging local businesses. We use our suppliers to provide a variety of industry related goods and services.

## **Our Policy on Slavery and Human Trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our supply chains.

We are also committed to the principles enshrined in the International Labour Organisation Conventions and the United Nations Convention on the Rights of the Child.

## **The Risks of Modern Slavery in Group Operations and Supply Chains**

The 'risks of modern slavery practices' mean the potential for the Group to cause, contribute to, or be directly linked to slavery, servitude, forced labour or human trafficking within our operations or supply chains.

We maintain strict employment and engagement standards in relation to our employees and contractors and a high degree of transparency and appropriate controls over human resources and labour systems. Accordingly, we do not consider that the Group's direct operations present a significant risk for modern slavery. We maintain confidential, anonymous and freely available reporting mechanisms set out in our Whistleblowing Policy which facilitates reporting of suspected misconduct or any improper practices. Our Code of Conduct and Business Partner Supply Chain Policy also requires that all employees and suppliers report any suspected non-compliance with the Group's policies and applicable laws (including modern slavery laws).

In relation to our supply chain, potential risks relate to materials, goods and services that we source through suppliers. These include possible risks of modern slavery in relation to deceptive recruiting practices, child labour, underpayment of wages, exploitation of migrant workers and bonded labour/servitude. We have assessed the residual risk as low based on the territories from which we source, historic and current supplier performance, the nature of our business relationship with our suppliers and the supporting policies and processes we have in place to help manage these risks. The monitoring and risk-assessment of our supply chain is an ongoing activity through our 'Heatmap' process.

## **Due Diligence Processes for Slavery and Human Trafficking**

As part of our commitment to identify and mitigate risk, we undertake due diligence when onboarding new suppliers and regularly review existing suppliers.



This includes:

- Mapping the supply chain to assess particular service or geographical risks of modern slavery and human trafficking (using guidance from the Global Slavery Index);
- Evaluating the modern slavery and human trafficking risks of each new supplier and reviewing all aspects of the supply chain every 12 months and immediately when there is a change to a contract or working arrangements based on the supply chain mapping exercise;
- Ensuring that all internal processes are being adhered to, for example ensuring that personnel provided by suppliers have the right to work in the UK, ensuring that limited company contractors are paid into verified bank accounts in their own name and ensuring that suppliers of personnel do not use offshore payment solutions;
- Vigilance during on-site supplier audits and inspections, and where breaches are identified, supporting a supplier to implement a corrective action plan with the aim of resolving breaches within an agreed time period, assisting to improve suppliers' practices by collaborating with clients, sharing best in-house practice within an open forum and imposing sanctions against suppliers that fail to improve their performance in line with an action plan or seriously breach our supplier code of conduct, which can include the termination of the business relationship.

Additionally, the Group utilises an identity verification system, Veremark which conducts DBS, right to work and employment reference checks to ensure transparency across our workforce.

We have in place systems to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains;
- reduce the risk of unauthorised access to funds by undertaking payroll audits
- protect whistleblowers; and
- continually monitor subcontractor adherence;

## **Supplier Adherence to Our Values**

We have zero tolerance to slavery and human trafficking. To ensure that all those in our supply chain and contractors comply with our values and ethics, we have implemented processes to:

- Clearly communicate our expectations to our supply chain in respect of sustainability, anti-corruption and bribery and ethical procurement through the Business Partner (Supply Chain) Policy;



- Encourage our suppliers to cascade a similar process and expectation within their own business and supply chains;
- Ensure suppliers adhere to our policies regarding supplier selection, on-boarding, risk analysis, performance measurement and continual assessment by making adherence to these policies a part of our contracts with our suppliers; and
- Ensure robust central processes by utilising a central interface platform called Pay apps for subcontractor diligence that is monitored to ensure modern slavery policy adherence by subcontractors.

We seek to monitor any risk areas and encourage anyone to report any concerns regarding supplier activities.

We will continue to enhance the standards we expect of our Supply Chain by implementing a new Supplier Code of Conduct.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide our employees, suppliers and subcontractors with a copy of the modern slavery policy and encourage them to report any concerns to their line manager. We have also included the policy in the Employee Handbook and cover it in our business ethics training, which is delivered to all managers, supervisors and subcontractors.

Our onboarding induction for both office-based employees and operatives includes modern slavery awareness training and a reminder of the ability to raise concerns to our independent whistleblowing hotline operated by Navex EthicsPoint.

We will continue to strengthen awareness by introducing Mandatory E-Learning training on Modern Slavery to all Group employees via our new Learning Management Platform, OCU Rise.

## **Our Effectiveness in Combating Slavery and Human Trafficking**

We use the following key performance indicators (KPIs) 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:

- Our aim is to ensure that 100% of new employees, workers and contractors are familiar with our modern slavery and human trafficking policy and statement and sign an acknowledgement in respect of this;
- Our aim is to ensure that 100% of new and existing large-scale suppliers provide us with a copy of their modern slavery and human trafficking statement;
- Our aim to issue our modern slavery and human trafficking policy to those suppliers who are judged to be potentially higher risk i.e. existing and new suppliers of personnel and existing and new overseas suppliers and obtain signed confirmation



from each supplier that they comply with our policy on modern slavery and human trafficking.

### **Further Steps**

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains, we will continue to improve our processes and encourage our staff to report any concerns they have, either to their line manager, General Counsel or using our Whistleblowing hotline.

### **Consultation and Approval**

OCU Group is managed by a centralised senior executive team with responsibility for OCU Group's business, including all subsidiaries. This statement was prepared by OCU Group with consultation and input from managers responsible for OCU Group's operations and supply chains, including the commercial, finance and procurement teams and the legal, governance and compliance team.

This Statement was approved by the Board of OCU Group Limited on 27 September 2025.

**Michael Hughes**  
Chief Executive Officer  
OCU Group Limited

**Date: 27 September 2025**