

MODERN SLAVERY POLICY

AT ENERGY

GLOBAL COMMERCIAL UTILITY SPECIALISTS

Introduction

This Modern Slavery and Human Trafficking policy relates to actions and activities of AT Energy (UK) Limited, and the steps taken and will continue to take to ensure that modern slavery is not taking place within our business, or supply chain.

The policy sets down AT Energy (UK) Limited commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

AT Energy (UK) Limited adheres to all laws concerning employment, preventing slavery and human trafficking within our business by adhering to (but not limited to) Modern Slavery Act 2015, Employment Rights Act 1996 and the Equality Act 2010

Organisational structure and supply chains

The Company operates within the mainland UK utilities market (England, Scotland and Wales).

The company uses industry registered suppliers of gas, electricity and water only. These suppliers are supply licence holders, verified by the Office of Gas and Electricity Markets (OFGEM) or The Water Services Regulation Authority (OFWAT) to procure the provision of utility contracts.

High Risk Activities

AT Energy (UK) Limited is based in England. Our main potential areas of high risk are associated with external suppliers of gas, electricity and water, some of which conduct business worldwide. To mitigate any potential risk, AT Energy (UK) Limited ensure that any supplier we have a relationship and dealing with themselves have publicly published a Modern Slavery Act policy.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to regularly undergo training to ensure their full comprehension of this policy and what they should do if they suspect this is taking place within our supply chain.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This policy affirms its intention to act ethically in our business relationships.

The following policies in addition to this Modern Slavery and Human Trafficking Policy, set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- 2.1 **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- 2.2 **Code of Conduct** - The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- 2.3 **Recruitment policy** - The Company has a rigorous recruitment policy, ensuring all employees are eligible to work in the UK to safeguard against human trafficking or an employee being forced or coerced into working against their will.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers.

Performance indicators

The Company uses the following key performance indicator (KPI) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chain: no reports are received from any employee, supply chain partner, law enforcement and/or the public indicating modern slavery practices have been identified.

Approval

This policy has been approved by the undersigned and will be reviewed at least once every two years.

Name	Matthew Loxston
Signature	
Approval Date	01/04/2025
Review Date	31/03/2027