

Regent Utilities Limited Slavery and Human Trafficking Statement January 2019

As per the requirements set out in The Modern Slavery Act 2015, this statement is made pursuant to section 54 – Transparency in Supply Chains etc.

Regent Gas is a privately-owned British business gas supplier providing natural gas, connection and metering services to small, medium sized and large corporate businesses, throughout England, Scotland and Wales. The company is regulated by OFGEM, the Office of Gas & Electricity Markets, for its gas shipping and gas supply activities.

Our policy is that we do not tolerate any form of slavery and human trafficking in our business or our supply chains and we fully support the aims of the Modern Slavery Act 2015

In our financial year ending 31 March 2018, we reviewed all our partners and suppliers and the result was that we identified no form of slavery or human trafficking taking place.

As part of our commitment to the Modern Slavery Act 2015, we will continue to monitor our dealings with all parties and where appropriate, train our staff to fully understand the issues.

A new statement will be published every year on our website www.regentgas.co.uk

Disclaimer

This policy is valid for all Regent Utilities businesses including Regent Water Ltd, Regent Gas Ltd, Regent Power Ltd and Energy Metering System (EMS).

Introduction

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

1. Policy

Our business approach reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing processes, policies and controls that seek to eliminate slavery and human trafficking in our supply chains.

To ensure modern slavery does not occur in our business or supply chains, we have a number of procedures in place.

2. Responsibility for the policy

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

Deep Valecha (Operations Director) with the secondment of Alunga Kalawe (Regulation & Compliance Manager) has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure all measures taken are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

3. Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Our Disciplinary Procedure provides a mechanism for dealing with matters of misconduct or breach of the Regent Utilities Code of Conduct which relate to slavery or human trafficking.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

4. Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. Staff, contractors and partners are required to avoid any activity that might lead to a breach of this policy.

Regent Utilities is continuously looking to collaborating with Government agencies and other reputable organisations, to deepen and share knowledge so that we may be impactful by engaging in this area.

5. Training and communication

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

6. HR policies

To ensure that modern slavery cannot exist within REGENT UTILITIES's own direct operations, the company undertakes a robust approach in its recruitment processes in line with UK employment laws, including:

- 'Right to work' document checks
- Back ground check of the employees
- Contracts of employment and checks to ensure everyone employed is legally employable

The UK Government's right to work checklist outlines the documented right to work evidence that can be accepted when REGENT UTILITIES employs a recruit and in what circumstance.

We contract with reputable employment agencies to source labour. We verify the practices of any new agency before accepting workers from that agency in line with our supply chain processes.

7. Supporting people

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any part of the Company's supply chains constitutes any of the various forms of modern slavery or if you suspect a breach of or conflict with this policy has occurred or may occur, you raise it with your line manager.

You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery or report a case on this website

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

8. Supply Chain

To ensure that we have the goods and services needed to supply energy services to our customers, Regent Utilities uses a wide range of suppliers who supply goods for sale, provide

services at events and support our operations. As most of our suppliers are, we work with professionals, consultants, and contractors who are mainly national.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Regent Utilities is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to acting ethically and with integrity in all its business relationships.

9. Due Diligence

Our supply chain due diligence processes include elements that identify any potential risks relating to slavery and human trafficking, and we carry out thorough risk assessments to identify areas of focus in relation to Modern Slavery concerns.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

We continue to monitor suppliers we believe present high modern slavery risks in our supply chain.

10. Risk assessment

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

For companies or individuals that REGENT UTILITIES contracts with, there will be a clause in its standard forms for new contracts that covers modern slavery.

These include a requirement for suppliers to be prompt to provide us with their Modern Slavery statement or policy upon request.

Where possible, we award contracts to companies registered in the UK. This ensures our suppliers are likely to match Regent Utilities levels of transparency in relation to UK employment law and the Modern Slavery Act.

We also put in place a checklist to track suppliers' potentiality of breaching the Anti-human trafficking rules.

11. Performance Indicators

We understand that we have a responsibility to continually assess and mitigate against the risk of modern slavery at Regent Utilities. We will continue to look whether further metrics can be implemented to monitor and measure our effectiveness in ensuring that modern slavery and human trafficking is not occurring in our business or supply chains via key performance indicators.

12. Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Regent Utilities' modern slavery and human trafficking statement for the financial year ending 31 March 2020.

Deep Valecha



Operations Director