



Modern Slavery & Human Trafficking Policy

Statement

Primary Power Consulting Ltd is committed to carrying out its business honestly, fairly and above all in accordance with the law.

This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Primary Power Consulting compliance statement for the financial year ending 31 April 2021

Purpose This statement sets out PPCL's actions to understand the potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking, forced labour or exploitation in its own business and those of its supply chain.

- PPCL is a leading multidisciplinary consultancy that delivers innovative electrical engineering solutions across rail, utility and power station infrastructure. Our supply partners are UK based however indirectly we purchase work with materials and services from Europe, North America and Asia.
- PPCL recognises that it has a responsibility to take a robust approach to slavery and human trafficking in support of human wellbeing and is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and associated practices.
- We have several policies, robust systems and procedures in place to help ensure we operate an open, honest and ethical business. By implementing our policies and working with our suppliers, we aim to be the partner of choice for our customers and to operate ethically and responsibly.

Responsibilities under the Act It is the responsibility of all PPCL personnel, particularly those focused on our procurement and in operational site teams, to maintain PPCL's duties in respect of the Modern Slavery Act 2015. Directors and senior managers hold special responsibilities to hear and support those raising concerns in compliance with the Act and our related Whistleblowing policy in respect of our integrity policies and the bribery act.

The following are the processes by which PPCL assesses whether activities or countries are high risk in relation to modern slavery or human trafficking. Since 2016 our leadership teams from across the business has been working together to train, educate and support our colleagues and our supply chain in raising awareness and tackling modern slavery.

Responsibilities

Overall responsibility for compliance with this policy shall be vested in Stephen Crawford, Managing Director. All employees and agents of the company will be individually responsible for ensuring correct procedures are followed and anti-bribery requirements are met in full.

Stephen Crawford
Managing Director

Document History

Version	Date	Amendment	Issued by	Authorised by
0	01/05/2020	First issue	Stephen Crawford Managing Director	Bruce Edgar Programme Director
1	21/06/2021	Annual Review & Registered Address Update	Stephen Crawford Managing Director	Bruce Edgar Programme Director
2	21/09/2021	Document number revision	Stephen Crawford Managing Director	Bruce Edgar Programme Director
3	08/04/2022	Annual Review & Logo update	Stephen Crawford Managing Director	Bruce Edgar Programme Director
3	24/02/2023	Annual Review & Logo update	Stephen Crawford Managing Director	Bruce Edgar Programme Director