



## MODERN SLAVERY & HUMAN RIGHTS POLICY

### Introduction

Power Wholesale Limited are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all our business relationships and undertake appropriate due diligence to identify and assess potential risk areas and mitigate the risk of slavery and human trafficking occurring.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement.

This document applies to all employees who work for Power Wholesale (including directors, managers, employees, sub-contractor or consultant staff), and also include other organisations who do business with us.

We will:

- seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner;
- seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships;
- provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts;
- continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

### Policy

This sets out our position with respect to human rights and modern slavery. Our statements below draw upon the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work:

### Child Labour

Power Wholesale will not use child labour and will comply with all relevant laws in this regard. We do, however, support legitimate workplace apprenticeships, internships and other similar programmes that comply with the applicable laws and regulations.

### Modern Slavery

Power Wholesale will not use forced, bonded or involuntary labour, and workers are not required to lodge 'deposits' or identity papers with the firm and can leave after giving reasonable notice, with all wages owed to be paid. We have a zero-tolerance approach towards human trafficking.

### Human Rights

We are committed to respect human dignity and rights of each individual and community whom we interact with during the course of work. We shall not, in any way, cause or contribute to the violation of human rights. Our employees shall treat everybody with dignity, respect and care and uphold human rights

### Health, Safety and Hygiene

All Power Wholesale employees will work in an environment that is both safe and healthy, in line with our UK Health and Safety Policy.

### Discipline

Power Wholesale prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation. Disciplinary and grievance procedures are clearly documented and communicated to all employees in our Employee Manual. All disciplinary measures of a serious nature are recorded and actioned.

### Freedom of Association and Employee Representation

Power Wholesale recognises that all its employees have the right to form and join organisations of their own choosing as long as this does not contravene the firm's External Appointments Guidance and Process policy, which ensures our independence, in line with the regulatory requirements of our business. The firm takes active measures to seek



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employees' views about the firm, respects employees' rights to belong to trade unions and fully complies with our legal obligations to inform and consult employees.

### **Working Hours**

Power Wholesale will ensure that working hours are reasonable and comply with the law and industry standards.

### **Equality of Treatment**

Power Wholesale is fully committed to eliminating discrimination in recruitment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability or social origin and to promoting equality of opportunity and treatment as outlined in the Employment Manual.

### **Employment Terms**

Power Wholesale will provide written and clear contracts which detail the terms and conditions of its staff employment. We will ensure that work performed by employees is on the basis of recognised employment law and practice.

### **Remuneration**

Power Wholesale will, at a minimum, provide wages and benefits that meet national standards. We will provide employees with clear written information on their pay and conditions. The firm prohibits deductions on employees' wages as a disciplinary measure. Power Wholesale is committed to equal pay and benefits for men and women for work of equal value.

### **Grievance and remediation**

Where a human rights violation is identified, we'll work with all parties involved to seek access to remedy, compensation and justice for the victim. We'll also investigate the root cause so that we can take appropriate steps to prevent such a violation reoccurring. Anyone raising a genuine concern which is in the public interest will be protected from victimisation

Signed:

Position: Managing Director

Date: 1<sup>st</sup> March 2022

Review Date: 1<sup>st</sup> March 2023