

Modern Slavery Statement

2025

Introduction

This is our first statement published in line with the requirements of Section 54 of the Modern Slavery Act 2015 ("the Act"). This statement highlights the key actions we have undertaken during the financial year to combat the risk of modern slavery and human trafficking within our operations and supply chains.



It is therefore a priority for us to ensure that **we treat people respectfully, trade ethically, source responsibly** and take steps to **prevent modern slavery** and **human trafficking** within our organisation



At United Gas and Power Limited ("UGP") we understand that modern slavery has taken several contemporary forms that violate human rights of people everywhere, including in the UK. It is therefore a priority for us to ensure that we treat people respectfully, trade ethically, source responsibly and take steps to prevent modern slavery and human trafficking within our organisation and we expect the same principles be applied by our suppliers.

Our Business

UGP was founded in 2013. Headquartered in Guiseley, Leeds, UGP is an energy supplier providing energy (gas & electricity) to businesses across the UK. We are also an independent shipper of gas in the UK. UGP supplies gas & electricity to about 9500 customers. As an organisation, we provide energy services to a diverse range of customers across multiple sectors. Our customer base includes small and medium-sized enterprises (SMEs), large corporate organisations, not-for-profit entities, GP surgeries, local authorities and essential manufacturers and service providers. We are committed to meeting the unique needs of each customer segment while maintaining high standards of service, compliance, and ethical responsibility across all areas of our operations.



We are **committed** to meeting the **unique needs** of each customer segment while maintaining **high standards of service, compliance, and ethical responsibility**



Governance and Policy framework

At UGP, our core values-

Passion *Together*
Success
Care *Pride*
Ambition

- serve as guiding principles for how our employees are expected to act, both internally and in representing the business externally. These values underpin our commitment to ethical behaviour and high standards of conduct, particularly in our operations and supply chain management.

We recognise that values must be reflected in day-to-day actions to be truly meaningful. To support this, we have established The UGP Pledge-

“Ethical Conduct- To consistently act according to our company values and uphold our responsibility to maintain ethical standards at all times”.



Our commitment to preventing modern slavery and human trafficking is further supported by a robust governance and policy framework. To this effect we have implemented clear internal policies including:

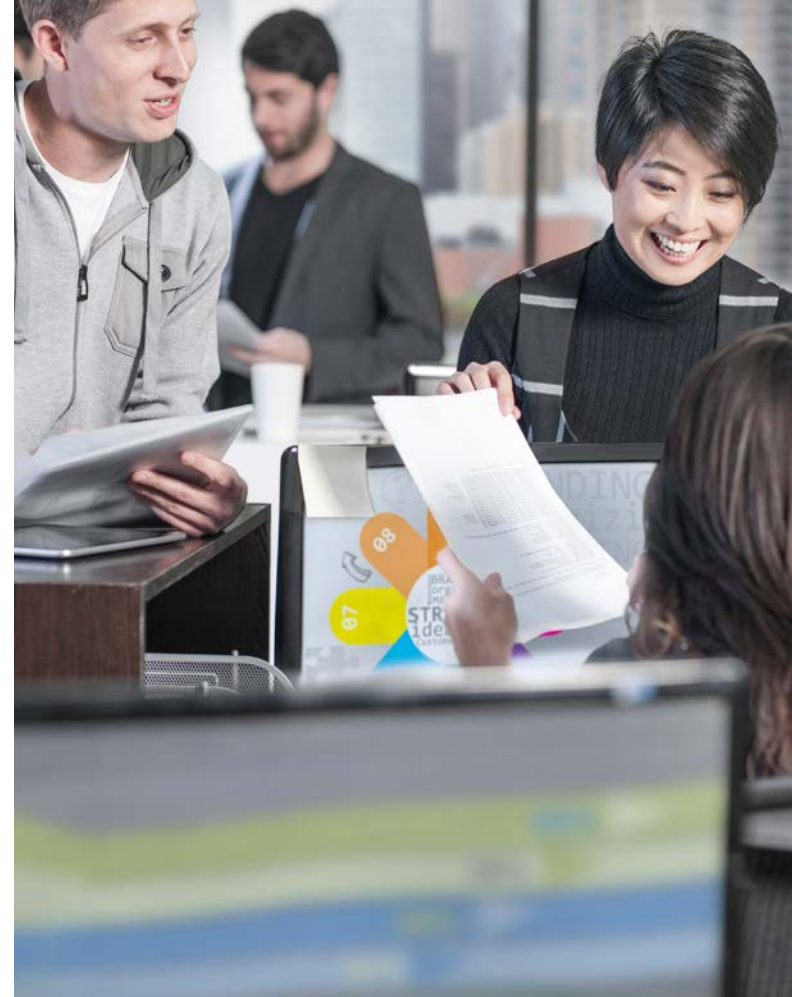
Anti-Slavery
Policy

Anti bribery &
Corruption Policy

Whistleblowing
Policy

Equal
Opportunities
Policy

Health and
Safety Policy



These policies are regularly reviewed and communicated, while responsibility for oversight sits with senior management, ensuring accountability at the highest level of the organisation. Our governance approach promotes transparency, integrity, and continuous improvement in tackling exploitation within our business and supply chains.

Our Staff

UGP employs about 90 people in the UK, and we are committed to fostering a working place that is safe and healthy, where our employees are treated fairly, and with respect.

Our employees are recruited through transparent and lawful processes, in line with UK employment legislation. We carry out i) pre-employment checks to verify the identity of prospective colleagues and that they are over 16 years of age and ii) “right to work” checks and requiring recruitment companies we use to also carry out equivalent checks. We ensure that no forced, bonded, or involuntary labour is used at any stage of employment.

We provide clear and accessible employment contracts, fair wages, and safe working conditions for all staff. Our internal policies promote equal opportunities and prohibit discrimination, harassment, or exploitation in any form. Furthermore, we ensure that all staff are made aware of their rights and responsibilities.



 we ensure that **all staff** are made aware of **their rights** and **responsibilities** 



Staff Training

UGP recognises that raising awareness among our staff is a key element in combating modern slavery. To support this, we provide training to employees to help them understand the risks associated with modern slavery, how to identify potential warning signs, and the appropriate steps to take if concerns arise. All employees including our senior management are mandated to undertake and pass this training at the point of commencement of employment and at regular intervals thereafter.

Additional training is also provided, that is tailored to specific roles, particularly for those involved in procurement, supplier management, and human resources, ensuring they are equipped to carry out due diligence effectively. This proactive approach empowers our staff to cultivate informed vigilance and contribute to maintaining ethical standards throughout our operations and supply chains.

Our Supply Chain

To supply gas and electricity to our customers, we engage with a diverse network of suppliers. This includes the procurement of various goods and services necessary for our operations, such as energy trading, metering, debt recovery, finance, marketing, legal, and IT support. In some areas of the energy sector, we are required to work with established and accredited industry providers which substantially reduces the risk posed by modern slavery and human trafficking. While we currently assess the risk within our supply chain as minimal, we remain vigilant and committed to ongoing monitoring and due diligence to ensure compliance with the Act.

To tackle the risk of modern slavery in our supply chain, we are committed to working only with

suppliers and partners who share our values and demonstrate a clear commitment to ethical labour practices. We prefer to engage directly with companies that are registered in the UK and expect these organisations to have appropriate policies and procedures in place to address modern slavery and human trafficking.

We also value the long-term relationships we have built with many of our suppliers. These enduring partnerships contribute to reducing potential risks, as they foster a strong mutual understanding of each party's operations, procedures, and core values. This alignment supports our efforts to uphold ethical standards and promote transparency across our supply chain.



Due Diligence, Risk Assessment and Key Performance Indicators (KPIs)

As part of procurement and onboarding, we take the following steps:

- Conduct pre-qualification assessments of our suppliers based on publicly available information and request documents where necessary.
- Embed specific contractual clauses requiring adherence to UK laws which includes modern slavery legislation.
- Encourage each participant in our supply chain to carry out due diligence on their immediate suppliers. We recognise that it is not feasible for us to maintain direct relationships with every tier of the supply network. Therefore, we rely on this tiered approach to promote accountability throughout the supply chain.
- May require certain suppliers, based on the outcome of our assessments, to complete self-assessment questionnaires answering focused questions on labour standards, working conditions, and modern slavery risks.

Our risk assessment process involves evaluating suppliers based on geographic location, industry sector, and the nature of services or goods provided. Higher-risk suppliers are subject to enhanced scrutiny. We do not do business with any other organisation, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. Where risks are identified, we will work collaboratively with suppliers to address and remediate them. In cases of serious non-compliance, we reserve the right to reconsider or terminate business relationships.

To evaluate the effectiveness of our approach, we monitor KPIs such as:

- The percentage of staff trained on modern slavery awareness.
- The frequency of specialised training for staff involved in procurement and recruitment.
- The number of modern slavery-related issues identified and addressed.
- The frequency of policy reviews and updates.

These KPIs help us track progress, identify areas for improvement, and ensure accountability across the organisation.



Looking ahead

We are committed to continuous improvement in our approach to tackling modern slavery and to promoting transparency throughout our supply chain and hope to take the following steps in the next financial year:

- Creating and implementing a Code of Conduct for Suppliers that sets out the minimum standards UGP suppliers must implement to demonstrate integrity.
- Creating a supplier database that flags potential indicators of non-compliance.
- Participating in the Modern Slavery Day in October- sending out communications, creating training tools and 'Spot the Sign' posters.

Approval

This statement has been approved by UGP's Board of Directors on behalf of UGP on _____.

Signed: 

Print Name: R. Taylor

Job Title: Director

Date: 30/6/2025



Modern Slavery
Statement
2025