

Modern Slavery Policy Statement 2023

INTRODUCTION

This Modern Slavery Policy Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (“the Act”) relating to Transparency in Supply Chains.

Above Limited (“Above”) recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking and indeed takes a zero-tolerance approach to non-compliance with the Act in any part of its business or its supply chain.

This statement sets out the steps Above will continue to take to address the risk of slavery and human trafficking within its operations and supply chain.

ORGANISATIONAL STRUCTURE

Above operates predominantly in the utilities sector.

Above is a portfolio company of Rubicon Partners who are industrial investors based in London.

Above has circa 720 direct employees and operates in the UK. Its Registered Office is in Chorley, Lancashire.

OUR BUSINESS

Above’s business involves mainly design work, capital works, repairs and maintenance across the UK infrastructure and utilities sector.

OUR GOVERNANCE FOR MODERN SLAVERY

The Above Executive Committee has overall responsibility in respect of the approach to Modern Day Slavery.

The Above Executive Committee has established a Modern Slavery Working Group to review the approach to Modern Slavery, co-ordinate and monitor the activities of the business in this regard and to produce the annual statement for approval by the Board of Directors.

The group involves representatives from Procurement, People & Culture, Communications & Social Impact, and Legal.

OUR POLICY ON MODERN SLAVERY AND HUMAN TRAFFICKING

Above is fully committed to reducing the risk of modern slavery or human trafficking occurring in its supply chain or in any part of its business with a zero tolerance for non-compliance.

This Policy applies to all Above employees as well as, suppliers and subcontractors, who must ensure that both their businesses and supply chains worldwide comply with this Policy.

This Policy reflects that commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the supply chain.

Suppliers and subcontractors must comply and act in accordance with this Policy.

Above has an effective grievance and whistle blowing process and policy in place to manage and investigate any concerns within the business or the supply chain.

OUR SUPPLY CHAINS

Above's supply chain includes:

- Plant, vehicles, and equipment suppliers
- Subcontractors and other service providers
- Suppliers of contingent labour
- Manufacturers and suppliers of goods and materials

All procurement of services and supplies is undertaken by professional procurement specialists. The intention is to build and maintain long term sustainable relationships with suppliers encouraging collaborative working and exchange of innovative and good industry practices.

The supply chain includes approximately 1200 suppliers and subcontractors of varying size and expertise.

The onboarding process includes a questionnaire to procure:

- No forced labour or human trafficking is practiced, and employment is freely chosen.
- Working conditions are safe and hygienic.
- Working hours are not excessive.
- Compliance with National Minimum Wage
- No child will be exploited.
- No harsh, cruel, or degrading practices are allowed.
- No discrimination is practiced.

A failure to satisfy the above criteria is an absolute bar to pre-qualification as a supplier to Above.

Certain areas require an enhanced level of diligence and Avove has taken a category specific approach, assessing the risk of Modern Slavery occurring within its business notwithstanding whether the deliverable is outsourced or delivered in-house. The emphasis can therefore be focused on those categories considered most at risk.

The following procurement categories are considered to be of highest risk of Modern Slavery occurring:

- Provision of Personal Protective Equipment
- Recruitment
- Cleaning Supplies and Services
- Provision of Temporary Staff

RECRUITMENT & TRAINING

Avove undertakes pre-employment screening that includes identity checks and confirmation of entitlement to work in the UK for all employees prior to commencing employment. This is supported by Avove's Right to Work Policy and Security and Vetting Policy.

As part of the onboarding process, on joining Avove each employee is given an overview of the essential policies and information in relation to those policies, procedures, and other matters such as whistle blowing.

Avove has implemented a comprehensive new training programme covering Modern Slavery and a range of other ethical matters.

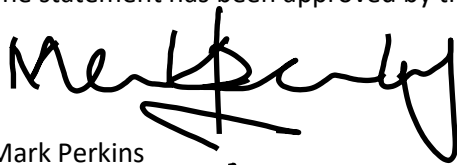
2023 PRIORITIES

In 2023 Avove will progress the following actions:

- Establish and embed its new training programme raising the awareness of Modern Slavery to all employees.
- Implement a site audit process in respect of Modern Slavery
- Continue to collaborate with industry partners to ensure best practice is being applied.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Avove's slavery and human trafficking statement for the financial year ending 31 December 2022.

The statement has been approved by the Board of Directors of Avove Limited.



Mark Perkins

Executive Chair

5th of April 2023