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|  | Title | <h1>Anti-slavery Policy</h1> | | Document No.: | HR.POL.38 |
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Green Frog Utilities Ltd recognises that slavery and human trafficking remain a hidden blight on our global society. The Company aims to identify our responsibility by alerting staff to the risks, however small, in our business and the wider supply chain. Staff are expected and encouraged to report management concerns, and management is expected to act upon them.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Green Frog Utilities Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or any part of our business.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that any form of modern slavery is not taking place anywhere in our supply chains.

Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company and that the Managing/Operations Director regularly reviews it to ensure its continuing suitability and relevance to the company activities.

The Company will achieve these aims by our initiative to identify and mitigate risk in the following ways (but not limited to):

- Vetting and investigation of our supply chain on prequalification questionnaires (contractors, sub-contractors, policies, contracts, etc.).
- Continually audit & review our practices to check that all employees are paid at least the minimum wage and have the right to work.
- We encourage the reporting of concerns and the protection of whistle-blowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance for slavery and human trafficking, and Green Frog Utilities Ltd expects all those in the supply chain and contractors to comply with our values.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we intend to provide in-house training to relevant members of staff as required. We use the following controls to measure how effective we have been in ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains:

- Completion of audits by Directors, HR, and H&S;
- Use of labour monitoring and payroll systems;
- Communication and personal contact with the next link in the supply chain, their understanding of, and compliance with, our expectations.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement. For transparency, Green Frog Utilities Ltd will publish this Anti-Slavery Policy Statement on our website for the public, consumers, employees, NGOs or investors to view. This policy applies to all those employed by PHD Electrical Contractors Ltd.



James Bourne – Director
8.12.25