

Regent Gas Ltd

Anti-Slavery and Human Trafficking Policy

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Name	Title or Stream	Location
Paul Mandair	Managing Director	Regent Gas

**Document Control
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0.2	Released	24 Apr 2023	Alunga Kalawe	Separation of the policy and the statement into two distinctive documents
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Formal Reviewers

Name	Title	Location
Alunga Kalawe	Regulation & Compliance Manager	Regent Gas

Management Approval

Name	Title
Paul Mandair	Managing Director

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DISCLAIMER

This policy is valid for all Regent Gas businesses including Regent Gas Ltd, Regent Power Ltd and Energy Metering Solutions (EMS).

This policy has been written in line with the Document Control Policy.

1 INTRODUCTION

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains, consistent with its obligations under the Modern Slavery Act 2015.

This policy applies to all individuals working for the Company or on the Company's behalf in any capacity, including employees, directors, officers, agency workers, volunteers, agents, contractors, consultants and business partners.

2 POLICY

Our business approach reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing processes, policies and controls that seek to eliminate slavery and human trafficking in our supply chains.

To ensure modern slavery does not occur in our business or supply chains, we have a number of procedures in place.

3 RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations.

Deep Valecha (Operations Director) with the secondment of Alunga Kalawe (Regulation & Compliance Manager) has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and policies and procedures to ensure all measures taken are effective in preventing or remediating the risk of modern slavery. They are also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Line managers are responsible for ensuring that those reporting to them understand and comply with this policy.

4 BREACH OF THE POLICY

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Our Disciplinary Procedure provides a mechanism for dealing with matters of misconduct or breach of the Regent Utilities Code of Conduct which relate to slavery or human trafficking.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they breach this policy and/or are found to have been involved in modern slavery.

5 COMPLIANCE

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. Staff, contractors and partners are required to avoid any activity that might lead to a breach of this policy.

Regent Utilities is continuously looking to collaborating with Government agencies and other reputable organisations, to deepen and share knowledge so that we may be impactful by engaging in this area.

6 TRAINING AND COMMUNICATION

Regular training on this policy, and on the risk that the business faces from modern slavery in its supply chains, will be provided to staff as necessary, so that they know how to identify exploitation and modern slavery and how to report suspected cases.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

7 HR POLICIES

. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. To ensure that modern slavery cannot exist within REGENT UTILITIES's own direct operations, the company undertakes a robust approach in its recruitment processes in line with UK employment laws, including:

- 'Right to work' document checks
- Back ground check of the employees
- Contracts of employment and checks to ensure everyone employed is legally employable

The UK Government's right to work checklist outlines the documented right to work evidence that can be accepted when REGENT UTILITIES employs a recruit and in what circumstance.

We contract with reputable employment agencies to source labour. We verify the practices of any new agency before accepting workers from that agency in line with our supply chain processes.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

8 SUPPORTING PEOPLE

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether a particular act, the treatment of workers or their working conditions within any part of the Company's supply chains constitutes any of the various forms of modern slavery or if you suspect a breach of or conflict with this policy has occurred or may occur, you raise it with your line manager.

You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery or report a case on this website

- <https://www.modernslaveryhelpline.org/report>
- [Gangmasters and Labour Abuse Authority](#)

Additional help and guidance involving businesses and slavery are available on the [Gangmasters and Labour Abuse Authority website](#).

Telephone: 0800 432 0804

Rydym yn croesawu galwadau yn Gymraeg / We welcome calls in Welsh.

Lines are open Monday to Friday 9:00am until 5:00pm.

9 SUPPLY CHAIN

To ensure that we have the goods and services needed to supply energy services to our customers, Regent Utilities uses a wide range of suppliers who supply goods for sale, provide services at events and support our operations. As most of our suppliers are, we work with professionals, consultants, and contractors who are mainly national.

The Company also expects the same high standards from all of its suppliers, contractors and other business partners and, as part of its contracting processes, it includes specific prohibitions against the use of modern slavery, and expects that its suppliers will in turn hold their own suppliers to the same standards.

Regent Utilities is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains, and to acting ethically and with integrity in all its business relationships.

10 DUE DILIGENCE

Our supply chain due diligence processes include elements that identify any potential risks relating to slavery and human trafficking, and we carry out thorough risk assessments to identify areas of focus in relation to Modern Slavery concerns.

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in many different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour in a work environment. In addition, some suppliers may go to great lengths to hide the fact that they are using slave labour. However, the Company accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

11 RISK ASSESSMENT

Over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

For companies or individuals that REGENT UTILITIES contracts with, there will be a clause in its standard forms for new contracts that covers modern slavery.

These include a requirement for suppliers to be prompt to provide us with their Modern Slavery statement or policy upon request.

Where possible, we award contracts to companies registered in the UK. This ensures our suppliers are likely to match Regent Utilities levels of transparency in relation to UK employment law and the Modern Slavery Act.

We also put in place a checklist to track suppliers' potentiality of breaching the Anti-human trafficking rules.

12 PERFORMANCE INDICATORS

We understand that we have a responsibility to continually assess and mitigate against the risk of modern slavery at Regent Utilities. We will continue to look whether further metrics can be implemented to monitor and measure our effectiveness in ensuring that modern slavery and human trafficking is not occurring in our business or supply chains via key performance indicators.

13 OUR POLICIES IN RELATION TO THE MODERN SLAVERY ACT 2015

The following policies are available to all staff through the REG092 - Employee Handbook.

Code of conduct

Whistle-blowers policy

Personal Harassment policy

Diversity and inclusion policy

Recruitment and selection policy

End of Document

Approved by

Paul Mandair
Managing Director

Signature

Paul Mandair