



Modern Slavery and Human Trafficking Statement

Introduction

This statement sets out Enzen Global Ltd actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1st April 2017 to 31st March 2018.

Enzen recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Enzen Global Ltd:

Enzen Global are business consultants and solution providers, working with a team of advisors and practitioners to combine Business Transformation; Business Operations; Energy & Water Networks; Digital Enterprise; Execution Excellence focusing on the energy and utility market.

We work from our own premises and customer premises around the United Kingdom.

The UK company employs 110 direct employees, supports circa 60 employees on deputation from India and also engages circa 50 Contractors, a total 220 staff.

The company's supply chain is limited to the procurement of onsite Contractors, office equipment and consumables purchased from UK suppliers.

We are key consultants to large utility and power companies and local authorities, and thus form an essential part of their due diligence programmes relating to modern slavery and human trafficking.

As a UK based employer with limited supply chain we have low risk of modern or child labour in our supply chain.

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** Responsibility for the introduction, maintenance and monitoring of compliance to our policies relating to employees and contractors sits with Claire Crew, Head – People & Culture. Responsibility for the monitoring and compliance of the Supply Chain sits with Anil Babu, Head Finance.
- **Investigations/due diligence:** The People & Culture department, Finance department and Risk & Compliance department will be responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking. The Risk & Compliance team will

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take the lead in the investigation and the People & Culture and Finance departments will support with the investigation.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- Equality & Diversity Policy
- Recruitment Policy
- Work Safe & Whistleblowing Policy
- Employee Code of Conduct
- Environmental Policy
- Health & Safety Policy
- Corporate Responsibility Policy
- Procurement Policy

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier
- conducting supplier audits or assessments via our quality assurance department, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

Training

The organisation requires all staff to complete training on modern slavery.

The organisation's modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;

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Assessing Effectiveness

The delivery of this modern slavery policy shall be monitored and shall form part of annual management performance review.

Corrective Actions

Should an occurrence or potential occurrence of modern slavery be identified, either internally related to employment practice or working conditions or externally with the supply chain then appropriate corrective action shall be taken in line with the company's Control of Non-Conformity Procedure. All non-conformity shall be recorded and the required actions implemented in a timely manner.

Policy Review

This will be subject to review following any lessons learnt, identification of non-compliance and as a minimum annually.

Policy Approval

As the individual ultimately responsible for company compliance I endorse this policy. Signed on

Behalf of Enzen Global,



Shashi Seshadri

Chief Executive Officer

29 March 2017