

# MODERN SLAVERY STATEMENT - 2025

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## A) ORGANISATION

This statement applies to Sapphire Utility Solutions Limited (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2024.

## B) ORGANISATIONAL STRUCTURE

We are a privately-owned business operating from our head office at Walton Summit and are a provider of Construction and Infrastructure services in the UK with a turnover of more than £160m. The business is led day to day by our Managing Director supported by a senior management team who are accountable for the delivery of our various contracts across the UK.

We currently have two depots that support the delivery of our contracts based at Bamber Bridge, Lancashire and Andover, Hampshire.

The main activities carried out by the Organisation are services to the clean water, wastewater, gas, industrial, construction and highways industries. Our operations also include gas, network intelligence, renovations and repairs of drains and sewers (no dig and UV Lining), high pressure water jetting, CCTV, underground radar and high-power vacuum trucks, including recyclers. Demand for our services is consistently high throughout the year, however, peaks are caused during periods of extreme weather.

The labour supplied to the *Organisation* in pursuance of its operation is carried out wholly within the United Kingdom, predominantly within North West and South coast regions .

## C) DEFINITIONS

The *Organisation* considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

## D) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.

## **E) SUPPLY CHAIN**

In order to fulfil its activities, the Organisation's main supply chains include those related to delivery of construction activities to maintain our client's utility and highway infrastructure and assets across the UK. We have a robust approach to supply chain management and understand that it is critical to the success of our modern slavery strategy and policy to engage with, support and develop our supply chain in this regard.

We understand that the Organisation first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

## **F) POTENTIAL EXPOSURE**

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## **G) STEPS**

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Reviewed and updated our supply chain onboarding procedure
- Developed a code of Ethics Policy and communicated to all employees and suppliers
- Introduction of a Whistleblowing process

## **H) POLICIES**

The Organisation has the following policies, which further define its stance on modern slavery

- Code of Ethics Policy
- Corporate Social Responsibility
- Anti-Bribery Policy
- Equality and Diversity Policy
- Recruitment and Selection Policy
- Whistleblowing Policy
- Supply Chain Onboarding Policy

Signed 

**Chief Operating Officer**

**Dated 4<sup>th</sup> January 2025**