

Modern slavery policy

1. Purpose and scope:

The Management of Alternative Heat (AH) understands modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which deprive an individual of their liberty while others exploit them for personal or commercial gain. Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act").

This document sets out the policy of Alternative Heat with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain.

AH operates a zero-tolerance approach to modern slavery. Management is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or those of our suppliers.

2. Responsibilities:

- Managing Director and Operations Director are ultimately responsible for the prevention of modern slavery.
- Managers are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.
- Head of Human Resources (HR) is responsible for being vigilant regarding labour on-site and for communicating any concerns to a director.
- All employees are encouraged to report any concerns of modern slavery, human trafficking, or unethical labour practices.

3. Definitions:

- Modern slavery A term referring to various forms of exploitation such as servitude, forced labour, and human trafficking
- Servitude A condition where individuals are forced to work against will, often for little or no compensation
- Human trafficking The act of trafficking individuals for the purpose of exploitation, often through coercion or deceit

4. Prevention of modern slavery:

AH are committed to ensuring transparency in our business operations and our approach to tackling modern slavery in our supply chains, in line with the Modern Slavery Act 2015. All employees have national insurance numbers and are paid directly into their own bank accounts. Payroll documentation can be made accessible to appropriate authorities upon request.

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We use agency labour through third-party providers, who are responsible for vetting staff to ensure they comply with legal protections to prevent exploitation.

Within our business, AH use agency labour which is procured through key third party providers. The providers are responsible for vetting all agency staff and ensuring that they adhere to all legal requirements to protect workers from poor treatment and exploitation.

We include appropriate terms in our contractual documentation standard terms and conditions and supplier code of conduct which require third party contractors to comply with the Modern Slavery Act 2015.

AH operate strict procurement processes, ensuring suppliers adhere to clearly defined policies of sustainability and ethical working practices. We expect these entities to have suitable anti-slavery and human trafficking policies and processes within their businesses and to cascade those policies to their suppliers.

5. **Reporting modern slavery and human trafficking:**

AH whistleblowing procedure is intended to provide guidance on how concerns can be communicated to AH. Concerns about suspected modern Slavery associated with AH or our suppliers, may be reported by employees in this manner.

AH aim 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. AH are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith, their suspicion that modern slavery of whatever form is, or may be, taking place in any part of our own business or in any of our supply chains.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

6. **Direct communication:**

AH also encourages members of the public to send an email, in confidence, to a company Director info@alternativeheat.co.uk should they wish to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

Management will investigate all concerns of slavery and human trafficking and will duly report their findings to the appropriate authorities should they have any suspicions that the act has been breached.

7. **Monitoring and review:**

Following its initial adoption, this anti-slavery and human trafficking will be reviewed by AH Board of Directors on a regular basis (at least annually) and may be amended from time to time.

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8. Communication and awareness:

This policy regarding modern slavery will be communicated internally to all our employees and to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Head of HR will receive training in how to recognise signs of slavery and human trafficking and in how to raise concerns with management.

This Policy will be used to inform our statement on slavery and human trafficking which will be published no later than the publication of our yearly financial results.

(This statement is made in accordance with Section 54(1) of the Modern Slavery Act 2015 and constitutes Alternative Heat anti-slavery and human trafficking statement.)

9. Related documents:

- Whistleblowing policy
- Employee handbook