

Modern Slavery Policy

Document reference	PWR-POL-003
Version	1.0
Effective date	September 2026
Document owner / signatory	Director, PWR People Ltd
Next review date	September 2027
Company	PWR People Ltd (Company No. 17448327), 2nd Floor College House, 17 King Edwards Road, Ruislip, London, HA4 7AE

Labour supply into construction and energy sites is a recognised higher-risk area for worker exploitation. This policy sets out how PWR People Ltd prevents modern slavery and human trafficking in its business and supply chains and what everyone connected with the business must do.

1. Purpose and scope

This policy applies to all staff, associates, contract workers, candidates and suppliers of PWR People Ltd. It reflects the Modern Slavery Act 2015 and supports our Modern Slavery Statement (PWR-POL-004).

2. Policy statement

PWR People Ltd has zero tolerance of modern slavery in all its forms — forced or compulsory labour, servitude, human trafficking, debt bondage and child labour. We are committed to acting ethically and with integrity in every placement and business relationship, and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.

3. Our risk areas

We assess the following as our higher-risk activities and apply enhanced controls to each:

- Supply of site-based technicians to wind and solar projects, where workers may be mobile, accommodated away from home, or subject to third-party recruitment fees.
- Candidates sourced from overseas or via intermediaries.
- Use of umbrella companies and payroll intermediaries.
- Any sub-contracting or second-tier supply.

4. Due diligence and controls

- Right-to-work and identity verification for every worker before assignment.
- Verification that wages are paid directly to an account in the worker's own name; duplicate bank details across workers are investigated.
- No recruitment fees are ever charged to candidates, and we require the same of any intermediary.
- Alertness to indicators of exploitation: controlled documents, a third party speaking for the worker, shared addresses or bank accounts, signs of coercion, or unusual availability.
- Umbrella-company accreditation checks and annual due diligence.

- Supplier questionnaires and contractual modern-slavery clauses.

Our approach is informed by the Home Office statutory guidance, Stronger Together and the Responsible Recruitment Toolkit. Where a labour-supply activity falls within the licensing scope of the Gangmasters and Labour Abuse Authority (GLAA) we will hold the appropriate licence before undertaking it.

5. Responsibilities

The Director is accountable for this policy and for ensuring it is implemented. All staff and associates must understand and comply with it, remain alert to indicators of modern slavery, and report concerns immediately.

6. Training

All staff and associates complete modern-slavery awareness training at induction and annually, covering the forms of modern slavery, the indicators, our controls and how to report concerns.

7. Reporting concerns

Concerns should be reported to the Director without delay. Serious concerns will be escalated to the GLAA, the Modern Slavery & Exploitation Helpline (08000 121 700) or the police. No worker, candidate or member of staff will suffer detriment for raising a concern in good faith.

8. Monitoring and KPIs

- 100% of staff and associates trained annually.
- 100% of workers with completed right-to-work and payment verification before assignment.
- 100% of umbrella partners and labour suppliers subject to due diligence within the last 12 months.
- Number of concerns raised, investigated and resolved (reported annually).

9. Review

This policy is reviewed annually by the Director alongside the Modern Slavery Statement; next review September 2027.