

POWERCUBE LIMITED: MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

I. Introduction

This Modern Slavery and Human Trafficking Statement outlines Powercube Limited's commitment to preventing slavery and human trafficking in our business operations and supply chains. It applies to the financial year 1 April 2021 – 31 March 2022.

Powercube Limited recognises its duty to remain vigilant to risks of modern slavery, however small. All staff are encouraged to report concerns, with management responsible for investigating and addressing any issues raised.

2. Organisational Structure and Supply Chains

This policy covers Powercube Limited's operations, which predominantly take place in the UK but occasionally extend worldwide.

For each new customer or project, the Company assesses the risk of modern slavery based on the activities involved and the country of operation. Appropriate measures are implemented where higher risks are identified.

3. High-Risk Activities

While Powercube Limited's direct activities are not typically classified as high risk for modern slavery, certain regions where we operate may be more vulnerable. A dedicated risk assessment is conducted for these cases to evaluate potential risks associated with subcontractors and business partners.

4. Responsibility for Anti-Slavery Initiatives

Responsibility for implementing and maintaining anti-slavery initiatives is as follows:

- 4.1 Policy Development and Review: The Head of Finance and Commercial develops and reviews policies, ensuring alignment with industry best practices and business needs.
- 4.2 Project Risk Assessments: Project Managers conduct human rights and modern slavery risk assessments on a project-by-project basis.
- 4.3 Due Diligence: The Head of Finance and Commercial oversees due diligence processes related to known or suspected instances of modern slavery and human trafficking.

5. Policies

Powercube Limited is committed to acting ethically in all business relationships and preventing modern slavery and human trafficking across its operations and supply chains.

Relevant policies supporting this commitment include:

- 5.1 Whistleblowing Policy: Encourages employees, customers, and business partners to report concerns related to the Company's activities or its supply chains.

6. Due Diligence Processes

Powercube Limited conducts due diligence processes to prevent and mitigate risks of modern slavery and human trafficking. These include:

- Establishing and maintaining long-term relationships with suppliers while clearly communicating our expectations.
- Assessing modern slavery and human trafficking risks associated with new suppliers.
- Reviewing existing suppliers regularly to ensure compliance with ethical standards.
- Implementing corrective action plans for suppliers failing to meet expectations, with potential sanctions for non-compliance.

7. Performance Indicators

To measure the effectiveness of our anti-slavery measures, Powercube Limited utilises a labour monitoring and payroll system to ensure compliance and detect any indicators of modern slavery or human trafficking within its operations.

8. Policy Review and Endorsement

This Modern Slavery and Human Trafficking Policy is reviewed and updated regularly to ensure its continued relevance and effectiveness. The management team fully endorses this policy and is committed to its implementation.

This policy has been approved & authorised by:

Name: Chloe Boxall

Position: Director

Date:

Signature: