

Utopi Limited  
Modern Slavery and Human Trafficking Statement

## **Introduction**

This Modern Slavery and Human Trafficking Statement.

The statement sets down Utopi's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

## **Organisational structure and supply chains**

This statement covers the business activities of Utopi, which are as follows:

- The sale of hardware and software to commercial real estate businesses and funds to help improve their environmental impact and regulatory reporting.
- Our hardware is installed by our own technicians or carefully selected and vetted third-party contractors.

The Company currently operates in the following countries:

- United Kingdom
- Ireland
- Spain

## **Risk assessment**

The Company will follow a structured, risk-based approach to assess the potential risks of modern slavery or human trafficking in its operations and supply chains, as well as in the regions where it conducts business. Here is a summary of how we approach this assessment:

- **Industry Risk Assessment:** The Company analyses its operations and supply chains against industry benchmarks and reports on modern slavery and human trafficking.
- **Geographical Risk Assessment:** We make use of data and reports from international bodies, NGOs, and governments on regions and countries known to have a high prevalence of modern slavery and human trafficking.
- **Business Practices Assessment:** We will conduct audits or investigations into the business practices of our suppliers and partners

where appropriate and proportionate to the potential risk, particularly those in high-risk industries or regions. This includes examining working conditions, pay and benefits, employee rights, and recruitment methods.

- **Regulatory Environment Assessment:** The Company considers the effectiveness of local laws and regulations to combat modern slavery and human trafficking in the countries where we operate or source from. Countries with weak law enforcement or regulatory controls are considered higher risk.
- **Continuous Monitoring and Evaluation:** Our risk assessment is not a one-off process. We continually monitor and re-evaluate our operations, suppliers, and the countries we do business in to identify any changes in risk.

This comprehensive, risk-based approach enables the Company to pinpoint high-risk areas and develop effective measures to mitigate the risks of modern slavery and human trafficking in its operations and supply chains.

## **Responsibility**

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

1. **Policies:** Brendan Waters, CFO, is responsible for creating and reviewing policies. We liaise with our HR partner, Mentor, to ensure we are up to date with best practices.
2. **Risk assessments:** Barry Oliver, COO and Health & Safety Manager, is responsible for risk assessments in respect of human rights and modern slavery,

## **Training**

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to complete a training course on Modern Slavery and an assessment on Mentor Learn. The completion of these is monitored by Brendan Waters.