



## Modern Slavery Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps Advanced Demand Side Management Ltd (“ADSM”) has taken to prevent modern slavery and human trafficking in its business and supply chains during the financial year up to 31<sup>st</sup> March 2025.

**1. Our Commitment:** Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, servitude, forced labour, and human trafficking—all of which deprive individuals of their liberty for personal or commercial gain. ADSM has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We aim to implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in our own operations or in our supply chains.

**2. Company Overview** ADSM is a water efficiency and demand management company providing retail water services, utility auditing, metering, and environmental consulting to public and private sector clients across the UK. ADSM operate under a statutory-regulated framework and work with a variety of suppliers including metering providers, engineering contractors, consultants, and data management firms.

ADSM operate primarily within the UK with an directly employed workforce with additional contractors and subcontractors engaged on a project-specific basis.

**3. Our Policies To** uphold our responsibilities under the Modern Slavery Act and promote ethical conduct throughout our business, ADSM maintains the following policies:

Anti-Slavery and Human Trafficking Policy

Anti-Bribery and Corruption Policy

Whistleblowing Policy

Equality and Diversity Policy

Supplier Code of Conduct

These policies are reviewed regularly and form part of our internal compliance in accordance with ISO9001 and training programmes.

**4. Employment and Recruitment** ADSM ensures all employees have the legal right to work in the UK and are paid at or above the National Minimum and Living Wage. We do not use zero-hour contracts and we do not engage in any practices that could give rise to forced or compulsory labour.

**5. Supply Chain Due Diligence** Our supply chain includes UK-based suppliers of IT systems, meter installers, environmental consultants, billing functions. While our risk of exposure to modern slavery is considered low, we remain vigilant. We expect all suppliers and contractors to comply with the Modern Slavery Act. As part of our onboarding process, new suppliers are required to confirm their compliance with applicable modern slavery legislation and affirm that they have policies in place to prevent exploitation in their own operations and supply chains. We are in the process of



implementing more formalised supplier due diligence procedures, including: Pre-engagement risk assessments based on sector and geography Periodic verification of supplier compliance Clauses in supplier contracts requiring adherence to anti-slavery legislation

**6. Training and Awareness** Modern slavery training is provided to relevant personnel, particularly those in procurement, supply chain management, and contract administration. Training forms part of employee onboarding and is refreshed annually via internal communications and online compliance modules.

**7. Reporting and Whistleblowing** We encourage openness and accountability. Any employee or contractor who becomes aware of a potential instance of modern slavery is expected to report it either to their line manager or via our confidential whistleblowing process. All reports are taken seriously and investigated promptly. ADSM is committed to ensuring no one suffers any detrimental treatment as a result of reporting a concern in good faith.

**8. Actions in the 2024–2025 Financial Year** In the last financial year, ADSM: Reviewed and updated its Anti-Slavery Policy Began integrating anti-slavery clauses into new supplier agreements Delivered training to staff involved in procurement and supplier management, Initiated a review of high-risk supplier categories and implemented early-stage screening procedures

**9. Future Steps (2025–2026)** In the coming year, ADSM intends to: Finalise implementation of a Supplier due diligence and attestation framework, conduct a pilot review of selected suppliers in higher-risk categories, roll out a new modern slavery risk dashboard within our procurement platform and incorporate modern slavery risk assessment into our annual supplier review process

This statement has been approved by the Board of Directors of ADSM Ltd and will be reviewed and updated annually.

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Patrick McCart

Director for and on behalf of Advanced Demand Side Management Ltd