Modern Slavery – Our Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Ingenious Power Engineering Ltd has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

Supply Chain Transparency

Ingenious Power Engineering Ltd are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. Ingenious Power Engineering Ltd expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, Ingenious Power Engineering Ltd include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and Ingenious Power Engineering Ltd may amend it at any time.

Responsibility for the policy

- The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The Office Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Compliance with the policy

- You must ensure that you read, understand and comply with this policy.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest,a breach of this policy.
- You must notify your manager or the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage.
- If you suspect a breach of this policy, report it to your manager or follow our Whistleblowing Policy immediately. If you're unsure whether an act or working conditions in our supply chain constitute modern slavery, consult your manager or the Managing Director.
- Ingenious Power Engineering Ltd encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if mistaken. We are committed to ensuring that no one suffers detrimental treatment for reporting in good faith their suspicion that modern slavery may be occurring within our business or supply chain. If you believe you have experienced such treatment, inform your manager immediately.

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Communication and awareness of policy

- Training on this policy, and on the risk our business faces from modern slavery in its reputation will be given during the Induction.

- Ingenious Power Engineering Ltd zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

- Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

- Ingenious Power Engineering Ltd may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Jason Johnson,
Managing Director,
January 2026

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