

Capula is a technical services company that delivery projects and systems integration to a large number of customers based in the UK. We do this through our employees, sub-contractors and equipment suppliers.

The below statement is made by Dalkia Group Ltd of which Capula Ltd is a subsidiary of. Capula Ltd fully endorses and complies with the statement.

This statement is made in accordance with the requirements of the Modern Slavery Act 2015. Dalkia UK has a zero-tolerance approach to modern slavery and is committed to working to ensure that our own operations, and those of our supply chains, are appropriately evaluating the risks of Modern Slavery. We are working to mitigate these risks as far as possible through our commitment to ethical business. We strive to improve our standards of ethical behaviour continuously and our commitment to ethical business practice is outlined in our Code of Conduct and accompanying Whistleblowing Policy. Our Boards of Directors, the Executive Management Teams, managers and staff members are fully committed to ensuring this outcome.

This statement is made by and on behalf of Dalkia Group Limited and its subsidiaries, which make up the Dalkia UK group as a whole (together in this statement, referred to as Dalkia UK). Those subsidiaries of Dalkia Group Limited that are required to make their own statement under the Modern Slavery Act 2015 have adopted this statement.

Policies

Dalkia UK has a number of policies, procedures and processes that support us to:

- Reduce the risk of slavery and human trafficking occurring in our business and supply chain;
- Provide adequate protection for whistleblowers; &
- Operate a robust supplier onboarding process.

These policies include:

- A comprehensive Code of Conduct and accompanying Whistleblowing Policy.
 - The Code of Conduct reminds our people that we are an organisation which acts honestly and ethically. Employees are reminded that they should report any concerns of potentially illegal activities, unethical conduct or anything that might prejudice the business either to the appropriate management or in accordance with the Whistleblower Policy.
 - A Whistle Blower policy which allows staff to report either through an independent Dalkia UK service or utilise the service provided by EDF Group.
- Employment policies, including:
 - Recruitment processes for carrying out checks on the right to work in the UK;
 - Up-to-date employment contracts which comply with UK labour laws, for example, in respect of the national minimum wage, making deductions from wages, notice periods and working time;
 - Equal opportunities policy;
 - Anti-harassment policy; &
 - Grievance procedures.
- Corporate Social Responsibility policies, including Health and Safety and Sustainability policies.
- Training and competence programmes for employees and subcontractors, including ensuring our employees and subcontractors have the minimum levels of qualifications required to deliver our contracts.
- Standard terms and conditions for our key suppliers, which require them to:
 - Comply with the Modern Slavery Act 2015 & all other anti-slavery & human trafficking legislation; &
 - Not engage in any activities constituting an infringement of the United Nations Guiding Principles on Business & Human Rights.
 - A breach of anti-slavery laws by a supplier constitutes a material breach of contract and is deemed not to be remediable.

Organisation structure and supply chains

Dalkia UK's operational business is solely within the United Kingdom, with the exception of some minor activities in Ireland. Accordingly, we consider the geographic risk of slavery and human trafficking to be relatively low. Nevertheless, we consider the main sector-related risks of our business as a technical services company that delivers projects, facilities management & systems integration to a large number of clients to be either within our supply chain (and suppliers to our supply chain) and to a much lesser degree, within our own workforce (including agency workers). We are committed to acting ethically & with integrity in all of our business transactions.

These two areas are addressed as follows:

Workforce – Training on modern slavery and trafficking

We have our induction and training processes to ensure staff members are aware of the Modern Slavery Act and its definitions of slavery and human trafficking. This includes an awareness training module on our online learning portal, which is available to all members of staff. We have ensured that our on-boarding procedure and employee handbook set out our policies and procedures, including our Whistleblowing Policy.

Supply Chain – Due diligence processes

The overwhelming majority of our supply chain is based in the UK, albeit some products and components do come from overseas. We have a supplier onboarding process that seeks to ensure that our supply chain consists of organisations that have good quality controls, suitable financial standing and are compliant with UK legislation. We consider this to be an initial risk management step to ensuring our supply chain conducts itself appropriately and therefore adopts anti-slavery practices. Furthermore, our standard supplier terms and conditions for working with Dalkia UK contain specific provisions relating to the Modern Slavery Act and Social Responsibility.

Risk assessment and Management

Risk Assessment: We adopt tender specification requirements to set expectations of how goods and services should be delivered. Tender evaluation processes are also designed to establish whether suppliers can meet these expectations. Where possible, we award contracts to companies registered in the UK. This means that our suppliers are likely to match our levels of transparency in relation to UK employment law and the Modern Slavery Act.

Highest Areas of Risk

1. Providing Services: We provide various facilities management services to our clients. Typically, the more technically based services such as equipment maintenance, are provided inhouse by our own teams or by specialist subcontractors. Both of these are, by nature, highly trained and specialist skill sets and are considered to be low risk of Modern Slavery. However, on a small number of contracts, we provide soft services such as cleaning, catering, reception and reprographic services. These are delivered either in house or through third-party providers. Such soft services could be considered at a potentially higher risk of modern slavery existing. We seek to mitigate this risk through the following measures:

- We monitor working hours of staff via site signing-in processes and timesheets;
- We utilise reputable service providers only. Our preference is for those providers with whom we have long-term and established relationships; &
- We seek to employ subcontractors on our standard terms & conditions. These stipulate the requirement to work in compliance with the Modern Slavery Act and the UN Guiding Principles on Business and Human Rights.

2. Procuring Goods: The other potential area of risk is around the procurement of goods and materials. The overwhelming majority of our supply chain is based in the UK. We have a supplier on-boarding process that seeks to ensure that our supply chain consists of organisations that have good quality controls. Further, our standard supplier terms and conditions for working with Dalkia UK contain specific provisions relating to the Modern Slavery Act compliance.

The above core documents, updated processes and the targeted awareness of modern slavery and human trafficking within our supply chain help us to ensure that Dalkia UK complies with the spirit and requirements of the Modern Slavery Act.

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2023, as approved by the relevant Boards of Directors.

This statement is adopted by the following companies:

- Capula Limited
- Dalkia Energy Services Limited
- Dalkia Engineering Limited
- Dalkia Facilities Limited
- Dalkia Group Limited
- Dalkia Operations Holding Limited
- Dalkia Operations Limited



Simon Coombs

Managing
Director



Kris Bradshaw

Sales and
Marketing
Director



Tina Buckley

Finance
Director



Steve Tellwright

People and
Quality
Director