

**Modern Slavery is a crime which transcends age, ethnicity, gender and territorial boundaries. The term is used to describe the use of fraud, force or coercion to recruit, transport, harbour, provide or obtain a person or persons for compelled labour or commercial sex acts.**

The Modern Slavery Act 2015 was introduced to tackle slavery within the UK and consolidates previous offences relating to both trafficking and slavery.

The Modern Slavery Act 2015 affects Smart Metering Systems Limited and each of our group companies ("the **Company**") as we fall within the definition of a "commercial organisation" involved in the supply of goods or services and with an annual turnover of over £36 million. The term "commercial organisation" encapsulates both listed and private companies and partnerships that carry on a business or any part of it within the UK. As a consequence, the Modern Slavery Act 2015 will impact upon foreign businesses acting within the UK.

## **1 Our Business and Supply Chains**

1. The Company provides a completely integrated service from beginning to end, from project managing the installation of the gas and/or electricity supply and connection and the provision of Carbon Reduction (CaRe) assets through to the procurement, installation and management of the meter asset, data collection, on-going energy management solutions and the optimisation of CaRe assets. This breadth of service makes us completely unique in the industry. There are no other organisations in a position to be able to offer all of these services simultaneously, meaning that without us our customers would need to use several different providers to cover their needs.
2. As a consequence of our widespread operational activities, we are involved in various supply chains with suppliers and it is these relationships which we are committed to ensuring are untainted by the concept of modern slavery. Through our range of innovative solutions, the Company's mission is to deliver the future of smart energy, working closely with both private and public sectors to achieve the UK's net-zero carbon target by 2050. This mission is underpinned by the Company's core values and behaviours linked to our commitment of "Putting Our People First".

## **2 Our Operational Policy**

1. The Company has a robust Modern Slavery Policy (the "**Policy**") in place. The Company takes the Policy very seriously and takes a zero tolerance approach to modern slavery in all forms. All employees are expected to adhere to the terms of the Policy. Our position is one which does not tolerate the concept of modern slavery within our immediate business and wider supply chain. The Policy is communicative of our ethical and moral principles when conducting business.
2. The Company also operates a robust supplier due diligence process, based on risk assessment and effective follow up. We expect all third parties that we work with to maintain their own modern slavery policies and this is supplemented by ensuring that our supplier and service provider contracts include strong obligations regarding compliance with modern slavery legislation.
3. We take any allegations of modern slavery, as existing within our immediate business or wider supply chains, extremely seriously as we consider modern slavery to be a clear violation of the most basic of human rights.
4. The Policy clearly states that any concerns or doubts about modern slavery should be addressed to the Company's General Counsel. All concerns and reports will be fully

investigated and, where appropriate, remedial action will be taken by the Company. Overall accountability is held by the Board of Directors of the Company.

### **3 Due Diligence and Audit**

1. As part of the due diligence process we include clauses within our contracts with new suppliers under which they will warrant to us that they are in compliance with, and will remain in compliance with, the terms of the Modern Slavery Act 2015.
2. As part of our wider due diligence exercise, we will liaise with new suppliers to ascertain the exact steps which they have taken to ensure that modern slavery does not taint their business. This will be through the completion of a questionnaire which will ask them to detail the compliance procedures which they have put in place to monitor their adherence to the terms of the Act.
3. As part of our ongoing audit of our existing supplier relationships we reserve the right to ask that they provide us with the necessary confirmations to the effect that they are compliant with the terms of the Modern Slavery Act 2015. This could be achieved by accessing their own Statement on Modern Slavery or by contacting them directly to discuss this matter with them and obtain such confirmations.
4. We will also ask our existing suppliers to sign up to our Modern Slavery Certification, attached to this Statement.

### **4 Violations**

1. As a Company our position does not tolerate modern slavery and any violation of the laws relating to the Modern Slavery Act 2015 and the use of slave labour may lead to the termination of our contracts with such suppliers.

### **5 Effectiveness**

Modern Slavery risk is dynamic. We are committed to continuous improvement and will continue to assess the effectiveness of our actions through:

- key staff training;
- actions taken on supply chain auditing and verification;
- steps taken to upskill any suppliers we consider high risk; and
- any investigations undertaken into reports of Modern Slavery and remedial actions taken in response.

## **Modern Slavery Certification**

We hereby confirm that we will comply with the following statements:-

### **Freedom of Employment**

We shall not force any person or persons to become our employee against their will through the use of force, coercion, fraud or any similar method. All of our employees are free to terminate their employment with us, subject to the terms and conditions of their contract of employment (being in all respects reasonable).

The conditions of employment which we implement will in all respects be reasonable and not require any employee to surrender to us any form of identification or any form of work permit, as a condition of their employment.

### **Ability to Communicate**

We encourage all of our employees to communicate with their line managers and other members of the management team. Our working environment is one which fosters openness and discussion without the threat of any form of reprisal.

### **Prevention of Slavery**

We do not knowingly violate the terms of the Modern Slavery Act 2015 either within the UK or out with the UK. We have taken any preventative steps which we consider necessary to eradicate modern slavery from our immediate business and any wider supply chains to which we are a party.

This statement was approved by the Board of Smart Metering Systems Limited.



Timothy Mortlock  
Chief Executive Officer  
July 2025