

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 smart energy and low carbon assets (including smart meters) through to the procurement, installation and management of assets, data collection, on-going energy management solutions and the optimisation of such 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. We recognise that certain categories within our supply chain carry a higher inherent risk of modern slavery exposure, including subcontractors engaged in construction and installation services, suppliers of renewable energy assets such as solar and battery storage components, and providers of IT outsourcing services. Our due diligence approach takes account of these risk categories to ensure that our efforts are appropriately prioritised across our supply chain.
3. 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, to comply with our Supplier Code of Conduct (which sets out our expectations in relation to modern slavery, ethical trading and responsible sourcing), 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 seek to 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. As noted above, all new suppliers are required to accept our Supplier Code of Conduct as a mandatory condition of our supplier onboarding process, which sets out the standards of conduct we expect all supply chain partners to uphold. .
5. As part of our evolving approach to supply chain transparency, we are in the process of enrolling our largest direct-spend suppliers onto an independent ESG performance monitoring platform. Whilst this provides broader sustainability and governance ratings rather than being specific to modern slavery monitoring, it forms part of our commitment to greater visibility of supply chain standards and responsible sourcing practices.
6. We continue to actively explore how our vendor management systems can be developed to enable periodic confirmation of ongoing compliance with these requirements across our wider supplier base.

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. Where the circumstances warrant it, the Company will also consider reporting identified violations to the relevant regulatory authorities and/or law enforcement agencies.

5 Effectiveness

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

- targeted training for key staff on identifying indicators of modern slavery, steps to be taken upon identification, and the benefits of combating such practices, delivered through our established internal training platform;
- actions taken on supply chain auditing and verification;
- steps taken to upskill any suppliers we consider high risk;
- any investigations undertaken into reports of Modern Slavery and remedial actions taken in response; and
- monitoring of ESG performance provided by our direct-spend suppliers through our independent supplier monitoring platform.

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.

Signed by:



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Ian Smyth
Chief Executive Officer
July 2026