

Utilita Group Limited Response to the Modern Slavery Act.

Statement for the year ending March 2022

This modern slavery statement for financial year ending March 2022 is made pursuant to section 54(1) of the Modern Slavery Act 2015.

It sets out the steps that Utilita Group Limited and its subsidiaries (Utilita Energy Limited, Utilita Field Services Limited, Utilita Services Limited, Utilita Telesales Limited and Hooga Limited) have taken towards ensuring that there is no slavery or human trafficking in their supply chain. Utilita Group Limited and its subsidiaries, hereafter known as Utilita, are committed to understanding the modern slavery risks and are continually working to ensure that there is no modern slavery within their supply chain.

Utilita is reliant on its supply chain and all its suppliers are required to be compliant with the Modern Slavery Act. Utilita recognises that there is a risk that modern slavery and human trafficking may occur within its supply chains.

The Modern Slavery statement was reviewed and approved by the Board of Directors on 22/09/2022.



Signed W. N. Bullen
CEO, Utilita Group Limited

About us

The UK's first and only specialist Pay As You Go smart energy supplier was founded in 2003 when our CEO, Bill Bullen, sat around his kitchen table with three colleagues and decided to challenge the Big 6. It was a gutsy thing to do – we were David to their Goliath – but the reasons were right and just.

We wanted to help those households who were being badly served and overcharged – primarily the prepay market.

Today, we are the energy company of choice for more than 800,000 households and have diversified to offer a complete digital utilities package – in addition to bringing back face-to-face dialogue with our customers at our high street Energy Hubs. Utilita is the only energy company created to help households use and waste less energy – meaning we're good for your pocket and the planet.

Since installing Britain's first-ever smart meter in 2008, we have used the latest and most reliable technology – including our award-winning My Utilita app (Uswitch Awards Best App 2020 and 2018) – to give customers more visibility and control of their energy usage than ever before. This allows them to make informed decisions about their usage and, in turn, their spend.

COVID-19

Due to the COVID-19 Coronavirus pandemic, we enabled most of our employees to work from home and continued to work remotely throughout 2021 and 2022. Both internal and external meetings are now able to be conducted face to face but we will continue to maintain the option to interact with our suppliers remotely via Microsoft Teams.

Current processes, risks and how we monitor and measure them.

Due Diligence Processes

We understand that the biggest risk for modern slavery is in our supply chain. When onboarding a new supplier, we operate the following to identify and reduce the risk of slavery and human trafficking:

- ✓ Request that suppliers populate pre-qualification questionnaires;
- ✓ Supplier due diligence by reviewing prequalification questionnaires and supplier policies;
- ✓ Ensure all contracts are reviewed and are compliant with current laws and regulations; and
- ✓ Ensure that only companies who match our level of transparency in relation to UK employment and modern slavery are approved.
- ✓ In line with one of our key business value, Fairness, we are not afraid to let our principles override our commercial drivers – if we don't believe a supplier or partner would work as we would expect, then we will not work with them.

Supplier Management

To measure the ongoing effectiveness of our onboarding and due diligence processes, we ensure that we are meeting with key suppliers as required to conduct QBRs ("Quarterly Business Reviews") and regularly visit. During 2021/22, we were able to resume face to face meetings with suppliers after Covid safety guidelines were changed. We have created a QBR tracker to ensure that agendas, minutes and actions are being tracked, and meetings are being scheduled regularly.

Recruitment

We ensure that all our employees and third parties working on behalf of Utilita in the UK are being paid at least the Living Wage and we continued to be an accredited Living Wage Employer and strive for equal pay. Our Gender Pay Gap Report is published at www.utilita.co.uk/policies

We ensure compliance with all applicable employment legislations relating to employee recruitment, including right to work evidence.

Training

Modern slavery e-learning continues to be available for our employees and it is required for our employees to complete the e-learning to ensure that they are knowledgeable about up-to-date modern slavery requirements.



During the financial year 2021/22, we continued to strengthen our supply chain by ensuring that all policies and procedures were followed and implemented.

The following were successfully implemented:

Annual Supplier Review

We continue to review our supplier base and if the supplier has not been used within the past 12 to 18 months, they were deactivated from our system and could no longer be used. If the supplier is to be used again in the future, the full supplier due diligence process would need to be completed and approved by Procurement before any orders are placed.

Contract Management

We continued to update and improve our contracts database during 2021/22 and we have monthly meetings to review upcoming contract renewals. Utilita's standard terms and conditions are regularly reviewed and updated to ensure robust modern slavery act obligations are included. Utilita's default position for new suppliers is that they agree and sign up to our standard terms and conditions.

Where suppliers terms and conditions are required to be utilised, we ensure that appropriate wording is included to ensure compliance to modern slavery obligations.

Other

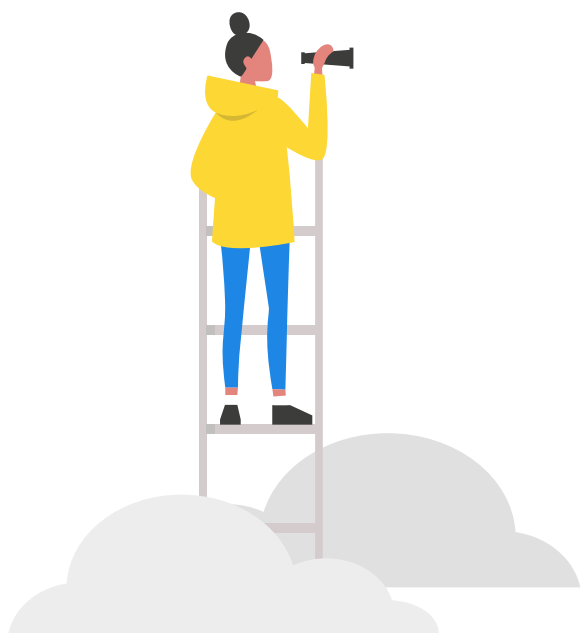
We continue to offer our employees a confidential way to disclose any wrongdoing, including malpractice and unlawful or unethical behaviour. By outsourcing the whistleblowing hotlines, it builds trust by increasing confidence in employees, making them more likely to report wrongdoing. There were zero calls to the hotline between April 2021 and March 2022. The whistleblowing hotline forms part of the Whistleblowing Policy.



The Policies

The following policies are reviewed and amended, if necessary, each year to ensure continued suitability to the organisation and that we maintain and uphold our ethical values:

- ✓ **Anti-Slavery & Human Trafficking Policy** sets out our commitment to acting ethically and with integrity with all business dealings, and our zero-tolerance approach to modern slavery and human trafficking.
- ✓ **Whistleblowing Policy** encourages the reporting of suspected wrongdoing or dangers, including modern slavery & human trafficking.
- ✓ **Procurement & Corporate Responsibility Policy** sets out the internal policy for purchasing goods and services as well as issues including business ethics.
- ✓ **Anti-Bribery Policy** outlines our position on preventing and prohibiting bribery.



The Future

We will continue to raise awareness about modern slavery, both internally and to our suppliers, with the following actions planned during the financial year 2022/23:

- ✓ Implement a **Code of Conduct for Suppliers** explaining how we expect our suppliers to operate to avoid labour exploitation. This is due to go-live by the end of 2022.
- ✓ Continue to review and update the procurement **Due Diligence Processes** including the supplier pre-qualification questionnaire to ensure enhanced due diligence is being completed for all new and existing suppliers. The supplier due diligence process is currently undergoing an update and is due to go-live by the end of 2022. Continue to review the Whistleblowing, Anti-Bribery, Procurement & Corporate Responsibility and Anti-Slavery & Human Trafficking policies annually.
- ✓ Continue to evaluate our supplier monitoring program, including further contract management database improvements to ensure our actions are consistent with best industry practices.
- ✓ Looking into becoming a member of the Institute of **Business Ethics**, an organisation which works to promote high standards of business behaviour based on ethical values and which provides high level guidance on Modern Slavery, alongside other issues relevant to business ethics.
- ✓ Look into participating in the '**Slave-Free Alliance Utilities Sector Modern Slavery Working Group**', a coalition of businesses working together towards eradicating slavery and exploitation in the utilities sector.