

# Utilita Group Limited Response to the Modern Slavery Act.

Statement for the year ending March 2023

**This modern slavery statement for financial year ending March 2023 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, Procode Technology Limited, Canary Care Global 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 18 September 2023.



**Signed W. N. Bullen**  
CEO, Utilita Group Limited

## About us

Utilita Energy, the UK's first and only specialist PAYG Smart Energy supplier, was founded by Bill Bullen in 2003. Bill understood and identified the social and environmental benefits of a re-imagined PAYG energy service in the digital age.

From day one, we have concentrated on proprietary tech and smart metering to revolutionise the old-style prepayment experience, delivering a far superior service.

Today, we are a group of eight companies spanning the energy retail and technology industries offering consumers better service and a fairer deal. Innovative technology remains at the forefront of all our operations.

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

### Due Diligence Processes

Although we consider that the risk of encountering modern slavery or trafficking through our suppliers is low given the nature of the services/good we procure and the location of the suppliers we acknowledge that the biggest risk for modern slavery is in our supply chain.

When onboarding a new supplier, we undertake the following actions to identify and reduce the risk of slavery and human trafficking:

- ✓ Request that suppliers populate pre-qualification questionnaires and provide a copy of their Modern Slavery Statement.
- ✓ Supplier due diligence by reviewing prequalification questionnaires and supplier policies.
- ✓ Ensure all contracts are reviewed and are compliant with current laws and regulations.
- ✓ Ensure that only companies who match our level of transparency in relation to UK employment and modern slavery are approved.
- ✓ Conduct visits to supplier sites and warehouses.
- ✓ In line with one of our key business values, Fairness, we are not afraid to let our principles override our commercial drivers and even with our low risk profile 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 regularly meet with our suppliers to conduct QBRs ("Quarterly Business Reviews"). A QBR tracker is utilised to ensure that agendas, minutes, and actions are being tracked, and meetings are being scheduled regularly across a number of key suppliers. We are looking to introduce a more robust framework to track and widen the QBR's we are having.

### Recruitment

Utilita Energy Limited is an accredited Living Wage Employer and ensures that all its employees and third parties working on behalf of Utilita Energy Limited in the UK are being paid at least the Living Wage. Whilst only Utilita Energy Limited is an accredited Living Wage Employer, the other members of the Utilita Group apply the principles of the Living Wage Foundation. As a Group, we strive for equal pay and our Gender Pay Gap Report is published at [utilita.group](https://www.utilita.com/gender-pay-gap-report)

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

### Training

Mandatory modern slavery e-learning (including annual refresher courses) is mandatory for all our employees to ensure that they are aware of and knowledgeable on current modern slavery requirements. This helps our employees to identify any issues and concerns regarding modern slavery.



## During the financial year 2022/23, 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 on a regular basis. If a supplier has not been used within the past 12 to 18 months, we removed them from our system. If Utilita has a need to engage a removed supplier, we conduct a full supplier due diligence process and obtain approval by Procurement before any supplier engagement can take place.

### Contract Management

We continued to update and improve our contracts database during 2022/23 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 it is necessary to use a supplier's terms and conditions, we ensure that appropriate wording is included to ensure we have appropriate contractual obligations to manage our expectations on the supplier's compliance with 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, this builds trust by increasing confidence in employees, making them more likely to report wrongdoing. There were zero calls to the hotline between April 2022 and March 2023. The whistleblowing hotline forms part of Utilita's 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 and 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 and human trafficking.
- ✓ **Procurement and 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 2023/24:

- ✓ Implement a **Code of Conduct for Suppliers** explaining how we expect our suppliers to operate to avoid labour exploitation. This is currently still under review and due to go-live by the end of 2023.
- ✓ 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 updated supplier due diligence process did go-live at the end of 2022.
- ✓ Continue to review the Whistleblowing, Anti-Bribery, Procurement and Corporate Responsibility and Anti-Slavery and Human Trafficking policies annually.
- ✓ Continue to evaluate and develop our supplier monitoring program, including further **contract management database** improvements to ensure our actions are consistent with best industry practices.
- ✓ Implementation of a contract management, sourcing and supplier management system to improve the audibility and record keeping of all procurement activity.

