



# Slavery and Human Trafficking Statement

SmartestEnergy Limited

FY 2020-2021

# Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of SmartestEnergy Limited and constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2020.

## Our company

SmartestEnergy Limited (the "Company") is a wholly owned subsidiary of the Marubeni Corporation, one of Japan's largest trading and investment companies.

Established in 2001 as one of the UK's leading energy trading businesses championing the role of independent generators and supporting smart businesses in their transition to net-zero carbon, we are a value creating Company and through our employees we will continue our efforts to make a significant contribution to the growth and stability of the global company.

## Our principles and values

It is the Company's policy that management and employees must comply with the highest standards of business and ethical conduct in all dealings with customers, suppliers, government officials and the wider community.

The Company's core values are "own it", "one team – one future", "innovate to accelerate" and "think customer".

## Relevant policies

The meaning of modern slavery and the Company's commitment to the fight against modern slavery are expressed in our "Modern Slavery Policy", accessible on our website at [https://www.smartestenergy.com/en\\_gb/about-us/modern-slavery/](https://www.smartestenergy.com/en_gb/about-us/modern-slavery/)

The Company is committed to taking steps where reasonably practicable to ensure that modern slavery is not taking place in any part of its own business or in any of its supply chains.

SmartestEnergy Ltd operates at all times in accordance with the principles of international standards and the Company's policies underpin our commitment to ethical business practices.

Other relevant policies of the Company are our "Rules to Prevent Bribery" and our "Compliance Manual".

## The Modern Slavery risk

The creation of our Modern Slavery Policy in 2016 was the first step towards the Company having processes in place to:

- Identify and assess potential Modern Slavery risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains
- Train and educate our staff on the risks of modern slavery

Since the legislation came into force the Company has conducted a review of its business partners and supply lines and has sought to gain assurance of their compliance with the Modern Slavery Act 2015.

All staff are required to take and pass an online course in modern slavery as part of their induction when joining the Company. In addition to our online training, a modern slavery overview is provided in the annual company-wide compliance training, which is mandatory for all staff.

Key members of our staff have attended training from external advisors on how to assess the risk of modern slavery in our supply chain and on compliance with the Act.

Whilst we have no information to suggest that modern slavery exists in our supply chain, we acknowledge that certain businesses may represent a higher degree of risk, and accordingly may require more detailed analysis and investigation.

Moving forward, the Company will continue to assess and review the risk that modern slavery may be occurring in any part of our own business and in any of our supply chains.

We recognise that modern slavery may exist to a greater or lesser extent in most if not all countries and in most industries. Whilst the majority of the Company's business activities are limited to the UK and Europe; we also recognise that some of our supply chains may extend further and therefore may to some extent be at risk in respect of modern slavery.

Building on the work we have already put into practice, we will continue to develop our understanding of the risks mentioned above (and any other risks that we identify) and then, based on the severity of the risk and the influence we may have in the relevant supply chain, review and update our process for due diligence in preparation for the identified risk.

It is worth noting that we have established many long-standing relationships with suppliers and we consider that in many cases such long-term partnerships will involve less risk because each of us should have a better knowledge and understanding of each other's operations and policies.

## **Internal organisation in relation to modern slavery**

Compliance with the Modern Slavery Act will be the responsibility of the Regulatory Risk Team (which reports directly to the Chief Operating Officer) and the Company's board of directors.

Progress and activities relating to compliance with the Act will be reported where appropriate (but at least annually) to the Chief Executive Officer and Chief Operating Officer who, along with the Company's board of directors, have overall responsibility for the Company's response to the challenge of slavery and human trafficking.

## **Declaration**

This Statement relates to the Company's financial year ended 31st March 2020 and was approved by the SmartestEnergy Limited board of Directors on 11th September 2020.

Signed: \_\_\_\_\_

Date: 28/09/2020

### **Robert Groves**

Director & CEO, SmartestEnergy Ltd