



Slavery and Human Trafficking Statement

SmartestEnergy Business 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 Dual Energy Direct Ltd and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2020.

Our company

SmartestEnergy Business Limited ("SmartestEnergy Business"/"the Company") is wholly-owned by SmartestEnergy Limited, which was 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. SmartestEnergy Business supplies small and medium-sized enterprises with both electricity and gas.

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 www.smartestenergy.com/en_gb/business/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 Business 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 the "Rules to Prevent Bribery" and our "Compliance Manual".

The Modern Slavery risk

The Company has steps in place steps 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

As part of the Company's ongoing annual compliance programme, mandatory Modern Slavery webinar training is currently being rolled out to all staff at the Company, to be completed annually. The Company anticipates that the training will be fully rolled-out by April 2021.

In addition, a Modern Slavery overview is provided in the annual company-wide Compliance Training, which is mandatory for all staff.

SmartestEnergy Business Limited

Premium House, The Esplanade, Worthing, BN11 2BJ

Registered in England & Wales: No. 06468946. Registered address: Premium House, The Esplanade, Worthing, BN11 2BJ

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

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. Additionally, Modern Slavery clauses are included in applicable contracts with external parties.

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 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 SmartestEnergy Limited's Regulatory Risk Team 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 Company's board of directors, who 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 has the approval of the Company's Board of Directors.

Signed:



Ben Giddings

Managing Director, SmartestEnergy Business Limited

Date: 24th September 2020

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