

Modern Day Slavery Policy.

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Modern-Day Slavery Policy.

1. Purpose.

This policy outlines the measures eEnergy has implemented to ascertain and ensure that neither slavery nor human trafficking is occurring within any segment of its business or in any of its associated partners and suppliers.

2. Policy Statement.

eEnergy acknowledges and fully accepts its legal and ethical obligations pertaining to preventing modern-day slavery and human trafficking. The company is committed to actively upholding these responsibilities and takes conscientious steps to ensure there is no presence or support of such activities within its business, as stipulated in Section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.

With a firm commitment to preventing any form of modern-day slavery or human trafficking within its business operations, subsidiaries, or within its network of partners and suppliers, eEnergy is dedicated to adhering to all recognised human rights standards, employment and organisational practices, and working conditions. We not only comply with these pertinent codes of practice and legislations but also proactively engage and implement measures to ensure that our partners and suppliers similarly uphold and comply with these stringent standards.

In pursuing this commitment, eEnergy employs a proactive approach to identify and mitigate the risk of modern slavery and human trafficking within its operations and supply chain. The company is dedicated to maintaining a business environment that is unequivocally opposed to the practices of modern slavery and human trafficking, and consistently works towards fortifying its preventative measures against the occurrence of such activities. Through this policy, eEnergy communicates its steadfast commitment to acting ethically and implementing effective systems and controls to ensure slavery and human trafficking is absent from its business and supply chains.

[Modern Slavery Act 2015 \(legislation.gov.uk\)](https://legislation.gov.uk)

What is Modern Slavery?

An individual could be a victim of modern slavery if:

- They are forced to work through the threat of mental or physical injury.
- They are owned or controlled by an 'employer' through the action of or threat of mental or physical abuse.
- They are dehumanised, treated as a commodity, or bought/sold as though property.
- They are physically constrained or are restricted in terms of their freedom of movement. This includes but is not limited to human trafficking, forced labour and debt bondage.

Our Policies.

We have several internal policies to ensure that we are conducting business in an ethical and transparent way. These include:

- **Recruitment policy** - robust processes are in place to ensure that all eEnergy employees undergo the relevant right-to-work checks.
- **Whistleblowing policy** - to ensure that employees know they can raise concerns about how colleagues are treated, or practices within the business or supply chain, without fear of repercussions.
- **Positive Working Environment policy** – to support creating and maintaining a Positive Working Environment where employees of the company are treated with respect and dignity and feel valued.

3. Definitions.

Slavery.

Where ownership is exercised over an individual.

Servitude.

Obligation to provide services through coercion, abuse, or the threat of abuse.

Forced labour.

An individual being forced to work against their will due to the threat of punishment.

Bonded labour or debt bondage.

An individual is forced to work to pay off a debt, usually associated with their recruitment, accommodation or food with no control over the debt they have accrued.

4. Scope.

This policy applies to all eEnergy employees, its partners, and suppliers.

5. Indicators of Modern Day Slavery.

Individuals who are victims of slavery or human trafficking may exhibit certain signs, which can be observed or gleaned from conversations. These indicators include:

- **Control Signs:** Observable signs of being under the control or dependence of another individual.
- **Authority Fear:** A discernible fear of police or other authority figures.
- **Trauma Indicators:** Visible signs of physical or psychological trauma.
- **Wage Withholding:** Evident withholding of wages, with victims being paid very little or not at all.

- **Malnourishment:** Clear signs of inadequate nutrition.
- **Extended Work Hours:** Working excessive hours or overtime with minimal breaks.
- **Freedom Restriction:** Limited freedom of movement, with constraints on activities after or before work.
- **Communication Fear:** Reluctance or fear of disclosing detailed information about their situation.

6. Responsibilities.

Our business operation predominantly focuses on working with customers in the Education and Healthcare sectors to reduce their energy consumption and costs. Our workforce and customers are located across the country.

Executive team – our executive team are responsible for ensuring that our onboarding process for new suppliers, partners and installers, is comprehensive, robust, and regularly reviewed to ensure that they remain compliant with the Modern Slavery Act 2015 and our best practice approach.

Line managers – line managers are responsible for ensuring that their teams understand their obligations regarding modern slavery, and also to ensure that they know how to escalate any concerns.

Employees – all employees are responsible for remaining diligent regarding behaviours that may be perceived as modern slavery. All employees understand who and how they should escalate any concerns.

This policy acknowledges that our delivery teams are the key contacts with our suppliers and partners, and are the most likely employees to highlight and escalate concerns regarding modern slavery. Similarly, our delivery teams are most likely to be exposed to modern day slavery and frequent discussions take place to ensure that they are protected.

7. Onboarding Suppliers

As part of our commitment to ethical business practices and compliance with the Modern Slavery Act 2015, we require all suppliers and partners to provide assurances that modern slavery is not present in their supply chains.

During the supplier onboarding process, we assess and verify that potential suppliers are compliant with laws prohibiting modern slavery, forced labour, human trafficking, and exploitation. To facilitate this, all suppliers must complete our Onboarding Form, which includes questions regarding their policies and practices related to modern slavery.

Suppliers must provide assurances that they do not engage in or support modern slavery in any form, and they must agree to adhere to our policies concerning human rights, ethical labour practices, and supply chain transparency.

Suppliers will also be required to provide information on the steps they are taking to prevent modern slavery within their own supply chains. Failure to comply with these requirements or to provide accurate information may result in the termination of the supplier relationship.

8. Who to Contact

If any eEnergy employee, worker or partner, suspects that an individual is a victim of modern slavery, they are urged to immediately report their concerns to their line manager. It is mandatory for line managers to document these concerns meticulously and escalate them to a senior member of the HR Team without delay. The HR team will then engage with external organisations as necessary in a timely fashion to address the reported concerns.

For staff members who are uncomfortable reporting their suspicions to their line manager, alternative reporting options are available. They may directly approach a member of the senior management team or use the confidential **Protect Whistleblowing Advice Line at 020 3117 2520** to report their concerns while preserving their anonymity. This ensures that all staff have accessible channels to report suspicions or concerns related to modern slavery confidently and securely.

9. Policy Review.

Policy Version	Last reviewed date/by:		Next review date:
01	September 2023	Louisa Gregory	September 2024
02	March 2025	Abi Wall - CPO	March 2027