

# Utilita Group Limited Response to the Modern Slavery Act.

Statement for the year ending **March 2018**

## Why?

**Modern Slavery Statement for financial year ending March 2018 pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's Slavery and Human Trafficking Statement for the financial year ending 31 March 2018.**

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 our supply chain.

Utilita is reliant on its supply chain and we require our suppliers to be compliant with the Modern Slavery Act.

The supply chain has grown to meet the demand and increased complexity and Utilita is fully committed to transparency within the supply chain, by conducting business ethically, consistently and responsibly.

## Who We Are

### About Us

Utilita is the leading provider of Smart Pay As You Go energy in Great Britain, installing every customer we supply a free smart meter and a highly competitive tariff.

Utilita specialises in supplying gas and electricity to Domestic and Commercial customers. With over 10 years of experience, we put an emphasis on excellent Customer Care, supporting all our customers with specialist advisors who are experienced in handling any enquiry.

The Modern Slavery Statement was reviewed and approved by the Board of Directors on the **10 September 2018**.

**During the financial year 2017/18, Utilita has worked to strengthen its supply chain by rolling out improved internal policies and procedures to identify risks within the supply chain. The following actions have been implemented:**

## 2017–2018

### Due Diligence

Improvements have been made to supplier validation and assessment during the onboarding and usage period of the contract.

A new supplier relationship management module was implemented in September 2017 which included the creation of the New Supplier Pre-Qualification Questionnaire (NSPQQ). The NSPQQ includes mandatory questions on modern slavery and human trafficking to ensure that all suppliers are compliant before being accepted into the Utilita Preferred Supplier List (Utilita PSL) and confirms the minimum standards expected of them. The NSPQQ is mandatory for new suppliers, which is then reviewed by the Supply Chain Administrators and designated Buyer.

As at September 2017, there were over 600 suppliers across Utilita. All suppliers without a formal contract in place were sent the Utilita Standard Purchase Order Terms & Conditions (Utilita T&Cs) and suppliers that did not agree to the new terms would be investigated. As a result, 6.6% of suppliers were deactivated. The Utilita T&Cs include our standard business conduct relating to Anti-Bribery and Anti-Corruption.

The Utilita T&Cs are attached to all purchase orders that are sent to suppliers via the purchase-to-pay system.

### Utilita Preferred Supplier List

In September 2017, a purchase-to-pay system was implemented to ensure that only suppliers on the Utilita PSL could be used. This has cut down on maverick spend from suppliers who had not completed the relevant due diligence to ensure we are only engaging with suppliers who are compliant with the Modern Slavery Act.

### Living Wage

Utilita Energy Limited is a Living Wage employer and is working to implement the principles of Living Wage across all companies under the Utilita Group.

Utilita work to ensure that all direct and indirect labour are paid the Living Wage.

### Risk Assessment

A preliminary risk assessment was applied to the supply chain with a risk status applied to each supplier: Low, Medium and High. 6.6% of suppliers were identified as being high risk and a documented and bespoke action plan was drafted to ensure full transparency for each potentially high-risk supplier. The action plan is split into 5 sections: Define, Measure, Analyse, Improve and Control, and supporting documents from the supplier were collated and reviewed.

### Training

In July 2017, training was provided by an external organisation on modern slavery and anti-bribery requirements to all teams with direct involvement in the supply chain. In August 2018, refresher e-learning was made available and is compulsory for all employees. It will be reviewed and re-released annually, as well as sent to new employees who will come into contact with the Utilita supply chain.

# The Policies

Utilita has a number of policies to minimise the risk of modern slavery in the supply chain. These policies are reviewed at least annually to ensure the continued suitability to the organisation, and ensure that Utilita maintains and upholds its ethical values.

Anti-Slavery & Human Trafficking Policy sets out Utilita's commitment to acting ethically and with integrity with all business dealings, and its 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 Utilita's position on preventing and prohibiting bribery.

# The Future

The Utilita supply chain has grown from 600+ supplies to 1000+ suppliers (August 2018) and we will continue to raise awareness about modern slavery internally and to our suppliers. The following actions are planned to be implemented during the financial year 2018/19:

- Review the business risk methodology for the procurement team to follow when engaging with new and existing suppliers.
- Review the full supply chain annually.
- Review the Whistle-Blowing, Anti-Bribery, Procurement & Corporate Responsibility and Anti-Slavery & Human Trafficking Policies annually.
- Continue to monitor high risk suppliers.

## Supplier Connect

To ensure that the supply chain remains engaged, Utilita is providing a central depository for the relevant supplier documentation and corporate messages.



# The Business Values

## Why the Business Values?

Utilita reviewed its corporate practice, against expanding teams and departments, to ensure our key values are known to every employee, supplier and business partner that works with or for Utilita.

Our values were determined in collaboration with the entire organisation from customers, suppliers, senior managers and engineers. The collaboration effort allowed Utilita to compare its practices with the written mission, and vision statements.

Our values align with everything we do, demanding ethical behaviour that is compliant with all laws and regulations. Our values are underpinned through the day to day business activities and in all business reviews.

## Our Values

Our values have been adopted by Utilita since March 2017 and are incorporated into the branding and displays around the organisation. Our values are as follows:

**Boldness**

**Excellence**

**Respect**

**Smart**

**Supportive**

**Agility**

**Trust**

**Fairness**



## The Roll Out of Our Values

The mission and vision statements are published in documentation, presentations and are displayed on the walls in Utilita since April 2017. Our values are there to support and strengthen Utilita while it continues to grow.

Utilita supports open communication, and has strengthened that communication through development of the U-Magazine, intranet, digital screens and by introducing staff forums with senior management and staff, coordinated by HR.

During July 2017, our values have been developed with the introduction of value champions who will drive those values in the day to day activities. This will include Utilita's extended supply chain, further embedding the mission and vision of Utilita expectations.

This statement was approved by the Board of Utilita Group Limited

Signed

A handwritten signature in black ink, appearing to read 'W. N. Bullen', written over a light grey background.

W. N. Bullen  
CEO, Utilita Group Limited