

Utilita Group Limited Response to the Modern Slavery Act.

Statement for the year ending March 2021

This modern slavery statement for financial year ending March 2021 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 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 22/09/2021.



Signed W. N. Bullen
CEO, Utilita Group Limited

About us

The UK's first and only specialist Pay As You Go smart energy supplier was founded in 2003 when our CEO, Bill Bullen, sat around his kitchen table with three colleagues and decided to challenge the Big 6. It was a gutsy thing to do – we were David to their Goliath – but the reasons were right and just.

We wanted to help those households who were being badly served and overcharged – primarily the prepay market.

Today, we are the energy company of choice for more than 800,000 households and have diversified to offer a complete digital utilities package – in addition to bringing back face-to-face dialogue with our customers at our high street Energy Hubs.

Utilita is the only energy company created to help households use and waste less energy – meaning we're good for your pocket and the planet.

Since installing Britain's first-ever smart meter in 2008, we have used the latest and most reliable technology – including our award-winning My Utilita app (Uswitch Awards Best App 2020 and 2018) – to give customers more visibility and control of their energy usage than ever before. This allows them to make informed decisions about their usage and, in turn, their spend.

COVID-19

Due to the COVID-19 Coronavirus pandemic, we enabled most of our employees to work from home and continued to work remotely throughout 2020 and 2021. Both internal and external meetings that would have normally been conducted face to face were now via video conferencing and we made sure that we still upheld the same level of communication as we would have pre-pandemic.



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

Due Diligence Processes

We understand that the biggest risk for modern slavery is in our supply chain.

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

- ✓ Request that suppliers populate pre-qualification questionnaires;
- ✓ Supplier due diligence by reviewing pre-qualification questionnaires and supplier policies;
- ✓ Ensure contracts are compliant with current laws and regulations; and
- ✓ Ensure that only companies who match our level of transparency in relation to UK employment and modern slavery are approved.

Supplier Management

To measure the ongoing effectiveness of our onboarding and due diligence processes, we ensure that we are meeting with our suppliers to conduct quarterly business reviews (QBRs) and regularly visit, where possible, suppliers' premises. This has been difficult to achieve in the last year due to COVID-19 and, where appropriate, these QBRs have been conducted via video conference.

During a QBR, we ask our suppliers to update us with any changes to their policies and we check annually that we have up to date information for all our suppliers.

Recruitment

We ensure that all our employees and third parties working on behalf of Utilita in the UK are being paid at least the Living Wage and we continued to be an accredited Living Wage Employer and strive for equal pay. Our Gender Pay Gap Report is published at www.utilita.co.uk/policies

Training

Modern slavery e-learning continues to be available for our employees and it is required for our employees to complete the e-learning to ensure that they are knowledgeable about up-to-date modern slavery requirements.

During the financial year 2020/21, 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

After reducing our supplier base by 46% in 2019/20, in early 2021, we undertook a full supplier review to minimise our supplier base and ensure that all suppliers had the correct due diligence.

At the end of 2020, there were 860 suppliers, and we were able to reduce our supplier base by 5% to 816 by early 2021. If the supplier hadn't been used within the past 12 to 18 months, they were deactivated from our system and could no longer be used.

If the supplier is to be used again in the future, the full supplier due diligence process would need to be completed and approved by Procurement before any orders are placed.

Enhanced Contract Management

A new contracts database was built in 2020. This enabled us to transfer many suppliers onto the Utilita Standard Terms & Conditions framework agreement which has robust modern slavery wording to ensure all suppliers are kept accountable. Where a new third-party agreement was under review, we ensured that suitable wording has been included to cover modern slavery.

The new database now flags whether the agreements we have in place have a specific modern slavery compliance clause to ensure that we are holding all our suppliers accountable

In addition to this, monthly meetings are held to review upcoming contract renewals.

Other

During 2020/21, we changed to a new outsourced whistleblowing hotline service to continue to offer our employees a confidential way to disclose any wrongdoing, including malpractice and unlawful or unethical behavior. By outsourcing the whistleblowing hotlines, it builds trust by increasing confidence in employees, making them more likely to report wrongdoing. There was one call to the hotline between March 2020 and March 2021. The whistleblowing hotline forms part of the 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 & 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 & 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 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 2021/22:

- ✓ Produce a **Code of Conduct for Suppliers** explaining how we expect our suppliers to operate to avoid labour exploitation. This is due to go-live by the end of 2021.
- ✓ Continue to review the Whistleblowing, Anti-Bribery, Procurement & Corporate Responsibility and Anti-Slavery & Human Trafficking policies annually.
- ✓ 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 is due to go-live by the end of 2021.
- ✓ All procurement contracts to be managed through the **contracts database** to ensure that all live agreements have suitable and compliant modern slavery wording.
- ✓ Review and update the **Quarterly Business Review Process** to include agenda templates, scheduling and minutes.

