

## Modern Slavery Statement 2022-23

**This FY 2022/2023 statement sets out myenergi's actions and commitments**

### Introduction

This statement sets out myenergi's commitment and actions to understand all potential modern slavery risks related to its business and to put in place steps to mitigate the risk of slavery or human trafficking in its business operations, partnerships and supply chain.

This statement outlines the actions undertaken in our financial year spanning 1<sup>st</sup> June 2022 to 31<sup>st</sup> May 2023.

### Organisational Structure

Myenergi is a UK based private company headquartered in North East Lincolnshire, specialising in the design, manufacture and sale of smart home energy technology products. The company premises include a manufacturing facility, warehousing and office functions operating from five sites. At this time the company employed 390 people in the United Kingdom.

The subsidiaries within our group are based in Ireland , Benelux, Australia and Germany .

### Our supply chains

Myenergi work with over 200 suppliers, of which over 90% are based in the United Kingdom. The company source components and services from 17 countries globally including Austria, Belgium, China, Denmark, Estonia, Finland, Germany, Ireland, Italy, Netherlands, Norway, Poland, Serbia, Slovakia, Slovenia, Sweden and the United States. Myenergi deliver products and services to tens of thousands of individual households and businesses through an in-house installation team, third-party installers and wholesale distributors.

We consider two key categories of suppliers :

- Stock - those suppliers who provide a good / service directly related to the manufacture of our products
- Non-stock - those suppliers who are not suppliers within the product supply chain and contribute to our business through other means eg construction of new premises, IT services, cleaners, consultants, office supplies, installation and distribution.

## **Our policies**

We are committed to making every effort to identify and combat modern slavery or human trafficking in our supply chains or in any part of our business operations and relationships. In response to the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place a designated Modern Slavery Policy to support our Whistleblowing Policy which allows staff to report any issues of concern. This includes any circumstances which may give rise to an enhanced risk of slavery or human trafficking in our supply chains and operations. Any issue raised related to modern slavery will be taken seriously and thoroughly investigated.

Our Modern Slavery Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure the risk of slavery and human trafficking is understood and that measures are in place to enable the business to work to remove modern slavery from our supply chain and partnerships.

Other policies and documents currently implemented which support our ability to address potential modern slavery risk include:

- Anti-Bribery and Corruption (ABC) policy
- Whistleblowing policy

Include reference to Supplier code of conduct here when we write one

## **Due diligence processes**

Within the electronics industry, both the sourcing of materials and components and the manufacturing of electrical equipment are known to have instances of human rights abuse. For example, through the use of child labour and forced labour in the cobalt mines of the Democratic Republic of Congo or the forced labour suffered by workers in the electrical assembly and processing lines in China.

We understand that our biggest exposure to Modern Slavery is in our product supply chains. In December 2022 the Wilberforce Institute at the University of Hull conducted a desk review of our key suppliers with the aim of identifying potential modern slavery hotspots in the regions and sectors in which Myenergi operates. From this research we have identified actions to strengthen our onboarding systems, policies and procedures so that we will be able to more effectively identify risks within our supply chains. Questions to suppliers will aim to identify labour management practices and processes, with a focus on training, monitoring and whistleblowing.

In February 2023 the Wilberforce Institute also conducted a modern slavery risk assessment of our manufacturing site.

Going forward we will focus on communicating our Modern Slavery Policy to all our first tier suppliers in order to gain transparency on their labour and human rights practices.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have initiated internal training for our staff and management teams on modern slavery. In 2022/23 employees from our HR and Procurement teams received modern

slavery training presented by the Wilberforce Institute.

Future statement if all employees get sight of code of ethics at onboarding

Future statement on the MPAS mechanism for communicating MS policy and how many have acknowledged it

### **Performance Indicators and Reporting**

In our first statement for our financial year 2021/22, we outlined proposed Key Performance Indicators (KPI) to ensure that we are measuring how effective our efforts are to combat slavery and human trafficking in our business activities and supply chains. Following the work with the Wilberforce Institute these have been refined to include:

#### Internally focussed KPIs

- The number of incidences of modern slavery reported within myenergi's own operations
- The percentage of relevant employees trained on preventing modern slavery and trafficking

In February 2023 employees from the Sustainability, Procurement and HR team received modern slavery training from the Wilberforce Institute, representing 30% of relevant employees.

The business has not received report of any incidents of modern slavery through the whistleblowing mechanism.

#### Externally focussed KPIs

- The percentage of suppliers aware of the Modern Slavery Act and its requirements
- The percentage of suppliers who have a Modern Slavery Policy
- The number of incidences of modern slavery reported in the supply chain
- The percentage of suppliers subjected to a modern slavery risk assessment/audit

The supplier desk review conducted by the Wilberforce Institute considered 103 top suppliers by spend. The results indicated that 40% of the suppliers were aware of the Modern Slavery Act, and 36.3% had a policy covering labour and human rights. However 67.6% of suppliers had a turnover below the legal threshold for compliance with the Act and are therefore not legally obligated to publish a policy.

We are yet to share our whistleblowing mechanism with suppliers or include modern slavery within our supplier audits.

Discussions with our staff and our management teams on how best to embed these KPIs across our business operations is ongoing.

### **Future Actions**

We will continue to develop our systems and tools to analyse further our supply chains to combat the

risks associated with the purchasing and distribution of our products and services. This includes, but is not limited to:

- Adding a reference of our standards on all Purchase Orders and supplier contracts. As such, all suppliers will be expected to fully reject the use of forced, bonded, or trafficked labour. We will also make our right to audit suppliers a requirement for business.
- Business checks during onboarding: We will continue to develop our supplier checks and supply chain monitoring and will work with our suppliers to further our understanding of risks.
- Addition of labour and human rights due diligence checks in supplier audits
- Training: Myenergi is committed to enhancing its training relating to its Modern Slavery Policy. As such, training for relevant employees will be further developed during the coming year with new annual training being implemented.

### **Consultation**

In preparing this statement consultation with internal teams including Sustainability, Procurement and Finance was carried out.

### **Board approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Myenergi slavery and human trafficking statement for the financial year ending 31 May 2023.

This statement has been approved by the organisation's board of directors and is signed on behalf of the Board by:

David Bailey – Chief Operating Officer  
Myenergi