



Modern Slavery and Human Trafficking Statement by Lowri Beck Holdings Limited

1 Introduction

This statement sets out the approach taken by Lowri Beck Holdings Limited and its subsidiaries (as set out below and together, “Lowri Beck”) towards identifying and preventing modern slavery and human trafficking in its business and supply chains, as required under the Modern Slavery Act 2015 (the “Act”).

Modern slavery has become a global societal issue creating concerns for government, commercial organisations and law enforcement agencies. At Lowri Beck we share this concern and believe that all organisations have a responsibility to work towards the elimination of these criminal acts. Our corporate values seek to protect everyone associated with Lowri Beck and are at the heart of all that we do. These values highlight our determination to prevent modern slavery and human trafficking within our operations and supply chains.

2 Our Business, Structure and Supply Chains

Lowri Beck Holdings Limited owns 100% of the shareholdings in each of Lowri Beck Services Limited, Lowri Beck Solutions Limited, Lowri Beck Systems Limited, Lowri Beck Direct Limited, Lowri Beck Software Limited and Lowri Beck Meters Limited. Lowri Beck Holdings is in turn owned by Calisen Holdco 3 Limited and forms part of the Calisen Group. The Calisen plc Modern Slavery and Human Trafficking Statement can be found [here](#).

Lowri Beck operates within the utility services industry for a wide range of energy suppliers. Operating nationally, we offer a variety of services including meter installation and data collection and utilise several supply chains to achieve this. We are committed to continuously making improvements in the identification and prevention of modern slavery and human trafficking, both within our own business and in our direct supply chain.

3 Policies

Lowri Beck has a suite of policies and procedures in place that are designed to support all of our employees across a range of issues. Integral to those policies are measures to support the prevention of modern slavery and human trafficking. We review all of our policies on a regular basis to ensure that they are fit for purpose and upload them to our online document management portal for all employees to access. Those policies that have a direct relation to modern slavery and human trafficking are:

- Corporate Responsibility Policy
- Procurement Policy
- Recruitment and Selection Policy
- Whistleblowing Policy
- Grievance Policy
- Dignity at Work Policy



- Equal Opportunities Policy
- Health & Safety Policy.

Alongside our in-house policies we are also aware of the UN Global Compact's 10 Principles. There are a number of internationally recognised declarations, standards and codes that we are aware of and respect: The UN Universal Declaration of Human Rights, UN Guiding Principles of Business and Human Rights, International Labour Organisation core conventions and the Code of Ethical Trading Initiative.

4 Due Diligence

Lowri Beck operates a range of certified management systems, including the quality standard ISO 9001, to help ensure that all relevant aspects of legal compliance and due diligence requirements are identified. In line with our management standards we continually review our due diligence processes to ensure that they meet the required standards. Lowri Beck's values enable our employees to be empowered to hold us and others we work with accountable for actions taken, and to ensure that we all act together in a safe and moral manner. There are three key areas where we have due diligence processes in place:

4.1 Employees

As part of our recruitment and on-boarding process we ensure that all employees have valid "right to work" status for the UK and can produce their own documents as requested. We also hold our agency and contracting employees to this same standard. We also run periodic bank account detail checks on our payroll system to highlight where we may be paying the same bank account on multiple occasions and investigating all of these occurrences to ensure that everyone has direct access to their own wages. This information is held securely within our Human Resources and Finance Systems for the duration of any contract to ensure that the correct on-going management of all employees.

We also hold an open Employee Forum for employees to raise concerns that relate to their particular business areas. The Employee Forum provides a great opportunity for a two-way communication channel with our employees and as part of this our Employee Representatives receive additional training and awareness. Training this group enables information to disperse through word of mouth around the business to supplement the other awareness platforms that we use, completing the two-way communication. Driving conversations through this approach ensures that issues of concern regarding specific individuals or groups are raised directly with company management. This is a key element of our due diligence process which ensures our workforce is safe and aware of risk, not only from elements of modern slavery and human trafficking, but in all elements of their work and wider well-being.

4.2 Suppliers

We source a wide variety of items from a range of providers and work to ensure that the items supplied are to the highest safety standards and best meet the needs of our business. This includes items such as company vehicles, uniform, tools and IT hardware. We also contract with a range of suppliers who provide us with services such as cleaning and waste management.

In 2019 we commenced some significant improvements to our supplier management and due diligence processes, introducing a supplier appraisal questionnaire, supplier appraisal additional information request and a purchasing procedure flow chart. All new suppliers are going through this process and existing suppliers are being transitioned when appropriate.

This supplier due diligence process covers all areas including policy review, modern slavery statement request, evidence of action to prevent child labour, evidence of ethical sourcing, corporate social responsibility, company understanding and employment contract management inclusive of pre-employment vetting.

4.3 External Organisations

We believe it is important for those organisations that we work with to be morally aligned with us. We are also passionate about sharing our corporate values with external organisations to ensure that that we build long term and mutually beneficial relationships. As part of our due diligence we ensure that all organisations who we engage with have a modern slavery and human trafficking statement in place that is easily accessible to other third parties. The largest group of external organisations we work with are our customers, and we have a robust vetting process in place to ensure that every applicable regulation and relevant business need is addressed through our contract arrangements. This includes required controls on modern slavery and human trafficking.

5 Higher Risk Areas

As a service business we work with a large number of external organisations and suppliers to deliver the desired service(s) to our customers, and we accept that this diverse network brings with it some extra risks that we need to manage and continually monitor. Below are the areas we have highlighted as our higher risk areas:

5.1 Smart Meters

The smart meters that we install are provided to us as part of our contractual agreements and as such we do not directly source them ourselves. However, as we handle them on a daily basis, we take all necessary steps with the suppliers to be assured that they are manufactured in line with all applicable standards and regulations with regard to safety, environmental standards, financial controls as well as modern slavery and human trafficking. As we generally do not have a direct role in sourcing the meters there are limitations on the extent to which we can directly influence the supply process, but the contractual agreements in place within all of our smart meter and metering contracts seek to ensure that that all parties are adhering to all necessary regulations and have processes in place to minimise all identified risks.

5.2 Textiles

The textiles industry has been highlighted in the past as a key area of risk for modern slavery and human trafficking, especially with regard to child labour and poor working conditions. We provide the majority of our workforce with Lowri Beck Uniform and Personal Protective Equipment (PPE). The main reasons for this are to ensure that our workforce is safe when carrying out their role and can be identified as employees of Lowri Beck. As we do not have a direct role in sourcing the material used in our uniform and PPE we are reliant upon our due diligence checks and contractual agreements to maintain effective controls. We have similar

contractual agreements in place with our uniform and PPE suppliers to those used within our metering contracts. These ensure that that all relevant parties are adhering to all necessary regulations and have processes in place to minimise all identified risks.

5.3 IT Hardware

Across Lowri Beck we use a wide range of IT hardware to meet the needs of each business area and we are continually replacing and upgrading this hardware as we innovate and grow. The global IT hardware supply chain has been identified as a growing concern in the context of modern slavery and human trafficking due to unlicensed supply of the rare earth metals required in the manufacturing process, and the use of specific manufacturing locations chosen for their labour costs in order to drive lower prices. To ensure that the hardware we use is not linked to this type of issue we only use reputable suppliers and brands that have been through our supplier due diligence process and satisfied us that they have measures in place to prevent modern slavery and human trafficking in their supply chains.

5.4 Agency Workers and Contractors

In 2020, we significantly reduced the numbers of agency workers and contractors in the delivery of our services. Notwithstanding this, all of our contractors are subject to the same right to work checks as any other Lowri Beck Employee and we ensure that everyone has the correct right to work documents and has access to these documents themselves. We also check bank account details to ensure that every employee has access to their own bank account and that it is in their own name. This information is held securely within our Human Resources and Finance Systems for the duration of any contract to ensure the correct on-going management of all agency and contract workers. The agencies we work with are also subject to contractual agreements which require them to conduct their own right to work checks and implement safeguarding processes against modern slavery and human trafficking whilst allowing Lowri Beck to audit their progress.

5.5 Visas and Work Permits

As part of the diverse workforce we have at Lowri Beck we have a small number of employees who require visas to work in the UK. These visas are checked before employment commences and then re-verified 6 weeks prior to expiration to ensure that they continue to have the correct authorisation to work in the UK. Our internal Human Resources system also generates a workflow reminder to ensure that this process is carried out in time to avoid or limit any disruption to the individual's contract. If any concerns are raised during initial verification or re-checking due to expiration they are escalated and investigated appropriately.

6 Training and Awareness

As part of our commitment to learning and development across our business, we are examining the most appropriate platform and content to deliver modern slavery and human trafficking training and awareness to every member of Lowri Beck. We aim for this to include specific training for front line employees in Procurement, Commercial Management and Human Resources in order to minimize our high-risk areas. This training had been planned to take place in 2020, but due to the impact of COVID-19 this has had to be pushed into our plan for 2021.



7 Governance

Responsibility for modern slavery and human trafficking sits at the highest level within our business, with our Board of Directors. They are committed to ensuring that Modern Slavery and Human Trafficking do not occur in any area of Lowri Beck or its direct associates.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, in relation to the financial year ending 31 December 2020.

This statement has been approved by the directors of Lowri Beck Holdings Limited and will be reviewed annually.

Signed

A handwritten signature in black ink, consisting of a series of loops and strokes, positioned above a horizontal line.

Director