

Modern Slavery Act 2015

Lowri Beck Holdings Limited

Modern Slavery and Human Trafficking Statement

Introduction

We are committed to improving our practices to combat slavery and human trafficking.

This statement sets out the approach taken by Lowri Beck Holdings Limited (Reg No 04347790) and its subsidiaries in England and Wales (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**").

Our business and structure

Lowri Beck operates within the utility services industry for a wide range of energy suppliers. Lowri Beck offer a variety of services including meter installation and data collection and utilise several supply chains to achieve this.

Lowri Beck Holdings Limited is the holding entity of the following subsidiaries:

Lowri Beck Services Limited	Reg No 3364728
LB Dormant Company 4 Limited	Reg No 6371746
Lowri Beck Systems Limited	Reg No 5234356
LB Dormant Company 1 Limited	Reg No 9225009
LB Dormant Company 3 Limited	Reg No 3822548
LB Dormant Company 2 Limited	Reg No 8465587
Plug Me In Limited	Reg No 13515633

Lowri Beck's supply chains

Lowri Beck invests and manages utility infrastructure assets. As an expanding business with a number of suppliers, Lowri Beck recognises that there is a risk (however small) of modern slavery or human trafficking to occur in its supply chains. Lowri Beck takes a zero-tolerance approach to modern slavery and human trafficking and adheres to the strictest behaviors and standards and expects the same of its suppliers. Lowri Beck therefore seeks to partner with suppliers that ensure a fair and ethical workplace, where workers are treated with dignity and respect and the highest standards of human rights are upheld.

Lowri Beck's policies

Lowri Beck has a range of policies and procedures in place that are designed to support all employees across a range of issues. Integral to those policies are measures to support the prevention of modern slavery and human trafficking. Lowri Beck reviews all of its policies on a regular basis to ensure that they are fit for purpose and upload them to its online document management portal for all employees

to access. The policies that have a direct relation to modern slavery and human trafficking are as follows:

- Corporate Responsibility Policy
- Procurement Policy
- Recruitment and Selection Policy
- Whistleblowing Policy
- Grievance Policy
- Dignity at Work Policy
- Equal Opportunities Policy
- Health & Safety Policy.

Alongside Lowri Beck's in-house policies, it is also aware of the UN Global Compact's 10 Principles. There are a number of internationally recognised declarations, standards and codes that it is aware of and respects, including: (i) The UN Universal Declaration of Human Rights, (ii) UN Guiding Principles of Business and Human Rights, (iii) International Labour Organisation core conventions, and (iv) the Code of Ethical Trading Initiative.

Due diligence processes for slavery and human trafficking

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 respect of human trafficking and modern slavery.

Internally, as part of Lowri Beck's recruitment and on-boarding process, they ensure that all employees have valid right to work status for the UK and can produce their own documents as requested, whilst also holding agency and contracting workers to this same standard. Lowri Beck also run periodic bank account detail checks on their payroll system to highlight where they 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.

Lowri Beck also source a wide variety of items from a range of suppliers and work to ensure that the items provided 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. They also contract with a range of suppliers who provide services such as cleaning and waste management. As such, in 2019, Lowri Beck commenced some significant improvements to supplier management and due diligence processes, introducing a supplier appraisal questionnaire, supplier appraisal additional information request and a purchasing procedure flow chart.

Following this, during 2022 Lowri Beck plans to further enhance its vendor management process to better understand and categorise the risks presented by suppliers. This involves consideration of the geographical location where its supply chain operates as well as assessing whether specific parts of the business or particular relationships or transactions are vulnerable to modern slavery and human trafficking.

As part of Lowri Beck's approach to combat slavery and human tracking typically a number of physical site visits to suppliers are undertaken in each financial year. However, due to COVID-19 some physical visits have not been possible in 2021 and therefore Lowri Beck has adapted its approach. When physical audits are not possible, virtual audits of selected suppliers are being undertaken to ensure compliance with the Act in accordance with Lowri Beck's standards.

Finally, the largest group of external organisations that Lowri Beck work with are their customers, and so alongside supplier due diligence, Lowri Beck have a robust vetting process in place to ensure that every applicable regulation and relevant business need is addressed through the respective contract arrangements with such customers. This in turn includes required controls on modern slavery and human trafficking.

Supplier adherence to Lowri Beck's values

Lowri Beck believe that it is important for all third parties that they work with to morally align with Lowri Beck's corporate values, to ensure that such organisations can build long term and mutually beneficial relationships. As part of Lowri Beck's due diligence process, they ensure that all organisations who are engaged have equivalent Modern Slavery and Human Trafficking statements in place that are easily accessible to other third parties.

Training

Lowri Beck are examining the most appropriate platform and content to deliver modern slavery and human trafficking training and awareness to every member of their team. This will include specific training for front line employees in Human Resources undertaking procurement and commercial management functions in order to minimise risk. This training had been planned to take place in 2021, however due to the impact of COVID-19 this has been delayed to 2022.

Lowri Beck's effectiveness in combating slavery and human trafficking

As a service business, Lowri Beck work with a large number of external organisations and suppliers to deliver the desired service(s) to customers, and so it is accepted that this diverse network brings with it some risks that are continually managed and monitored. Below is a non-exhaustive list of the areas that Lowri Beck have highlighted as their higher risk areas:

- smart meters – the smart meters installed by Lowri Beck are provided as part of their contractual arrangements with third party suppliers, and so Lowri Beck does not directly source the smart meters. Nevertheless, Lowri Beck use their metering and smart metering contracts to ensure that all necessary steps are taken with suppliers to be assured that such meters and smart meters are manufactured in line with all applicable standards and regulations concerning safety, environmental standards, financial controls and modern slavery and human trafficking;
- textiles – the textiles industry is highlighted as a key risk area for modern slavery and human trafficking, especially with regard to child labour and poor working conditions. As Lowri Beck provide the majority of their workforce with Lowri Beck uniforms and Personal Protective Equipment (PPE), Lowri Beck utilise their due diligence checks and contractual agreements to maintain effective controls and ensure that that all relevant parties adhere to the necessary regulations and minimise all identified risks;
- IT hardware – across Lowri Beck, a wide range of IT hardware is used to meet the needs of each business area and such hardware is continually being replaced and upgraded. The global IT hardware supply chain has been identified as a growing concern in the context of modern slavery and human trafficking due to the 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 that Lowri Beck uses is not linked to this type of issue, only reputable suppliers and brands are engaged and Lowri Beck's supplier due diligence process is also applied to ensure that such suppliers have measures in place to prevent modern slavery and human trafficking in their supply chains.
- agency workers and contractors – all Lowri Beck contractors are subject to the same right to work checks as any other Lowri Beck employee (please see above). Further, Lowri Beck also ensure that any agencies that have been engaged are also subject to contracts requiring such agencies 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;
- visas and work permit – As part of the diverse workforce at Lowri Beck, there are some employees who require visas to work in the UK. These visas are reviewed before employment commences and then re-verified 6 weeks prior to expiration to ensure that such employees

continue to have the correct authorisation to work in the UK. This is also managed by Lowri Beck's internal Human Resources system, which generates a workflow reminder to ensure that this process is carried out in time to avoid or limit any disruption to the employee's contract. If any concerns are raised during initial verification or re-examination due to expiration, such concerns are appropriately escalated and investigated.

Further steps

Lowri Beck is committed to continual improvement and will take active measures to combat modern slavery and human trafficking in its business and supply chains.

This statement is made under section 54(1) of the Modern Slavery Act 2015 and constitutes Lowri Beck's Slavery and Human Trafficking Statement for the financial year ending 31 December 2021.

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

Signed: Sean Latus

Date: 8 March 2022

Director