

# Modern Slavery Act 2015

## Calisen plc 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 Calisen plc and its subsidiaries in England and Wales (as set out below and together, “Calisen”) 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

Calisen is a leading owner and manager of essential energy infrastructure assets, as well as a provider of installation, meter reading and maintenance services. Calisen’s operations consist of two business units: Calvin Capital (Calvin Capital Group Holdings Limited and subsidiaries) and Lowri Beck (Lowri Beck Holdings Limited and subsidiaries).

Calvin Capital, the larger of the two business units, is almost exclusively a meter asset provider (“MAP”) that procures, installs, owns and manages a growing portfolio of domestic electricity and gas meters, with a particular focus on smart meters.

Lowri Beck operates within the utility services industry for a wide range of energy suppliers. Operating nationally, it offers a variety of services including meter installation, meter operator provision (or “MOP”), meter asset management (or “MAM”) and traditional meter reading services to its customers.

Calvin Capital and Lowri Beck have each produced their own Modern Slavery and Human Trafficking statements in relation to the steps taken in investigating their own supply chains. Calvin Capital’s statement can be found [here](#) and Lowri Beck’s statement can be found [here](#). These statements reflect this Calisen plc Modern Slavery and Human Trafficking Statement.

### Our supply chains

As an expanding business with a number of suppliers, Calisen recognises that there is a risk (however small) for slavery or human trafficking to occur in its supply chains. Calisen takes a zero-tolerance approach to slavery and human trafficking and adheres to the strictest behaviours and standards and expects the same of its suppliers. We therefore seek 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.

### Our policies

As highlighted in our values, it is a fundamental policy of Calisen to conduct its business with integrity and in accordance with the highest standards of ethics, equity and fair dealing.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Calvin Capital and Lowri Beck each has their own policies in dealing

with these issues, as can be seen from their independent statements on the subject.

These policies reflect Calisen's commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### **Due diligence processes for slavery and human trafficking**

Calisen has taken appropriate steps to help ensure that slavery or human trafficking has not taken place in its supply chains and in any part of its own business.

Internally, we have robust recruitment processes which include undertaking document checks on candidates prior to employment to evidence that they are permitted to work in the UK, performing appropriate reference checks and ensuring that staff are paid directly into a suitable personal bank account. In relation to our supply chains, we have reviewed our contractual arrangements with current and prospective suppliers to ensure they comply with the Act.

As part of our initiative to identify and mitigate risk, we have: 1) reviewed and revised our procurement processes; 2) reviewed our due diligence processes; 3) acknowledged the need to map our supply chains to identify the parts of the supply chains where the risks are most severe or most likely to occur; and 4) recognised that processes should be adopted to identify and assess potential risk areas in our supply chains. This involves consideration of the geographical location where our 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.

### **Supplier adherence to our values**

Calisen engages with its suppliers to seek assurance about their anti-slavery and human trafficking policies and whether they are taking steps to prevent slavery and human trafficking in their respective businesses and supply chains. Calisen will not support or engage suppliers where it is aware of slavery or human trafficking in such suppliers' business or supply chains or where a supplier has failed to give Calisen the requisite assurances.

### **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 are mindful that appropriate training should be introduced and delivered to our staff. Calvin Capital has rolled out an online training program on modern slavery, developed by Thomson Reuters, to increase awareness amongst staff. Calisen plc staff will complete the same training as Calvin Capital staff. Lowri Beck is in the process of developing a training programme. Once complete, this will provide employees with knowledge on how to identify exploitation and modern slavery as well as the process for reporting suspected cases.

### **Our effectiveness in combating slavery and human trafficking**

Our analysis suggests that the risk for Calisen of involvement in modern slavery and human trafficking is low on the basis that we conduct extensive due diligence processes on our supply chains and our supply chains are established suppliers that have in place significant due diligence processes. When dealing with suppliers operating in jurisdictions outside the United Kingdom, we implement a full assessment on their compliance with, amongst others, the Act and, if appropriate, we require a site audit to those suppliers to ensure their compliance with Calisen's standards.

A number of these site visits have been carried out in this financial year with more scheduled for 2020, including visits to some of the factories that are used to produce the meters that are purchased by Calisen. This involves a number of senior members of our staff visiting selected sites and performing

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extensive due diligence to ensure compliance with the Act in accordance with Calisen's standards. During these visits our staff review the working conditions, the sanitary facilities, the recruitment and training, and reward and recognition processes at the sites and agree with the relevant supplier any follow-up actions that will be taken to further improve each of these areas.

### **Further steps**

We are committed to continual improvement and will take active measures to combat modern slavery and human trafficking in our business and supply chains.

This statement is made under section 54(1) of the Modern Slavery Act 2015 and constitutes Calvin's slavery and human trafficking statement for the financial year ending 31 December 2019.

This statement has been approved by Calisen plc's board of directors and will be reviewed annually.

Signed: Phil Nolan

Date: 24 January 2020

**Director**

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Calisen plc is the ultimate parent of the following subsidiaries (together “Subsidiaries” and each a “Subsidiary”):

<b>Calisen Group Holdings Limited</b> (formally CCH1 Limited)	Reg No: 10504539
<b>Calisen Group 2 Limited</b>	Reg No: 12410272
<b>Calisen Group Limited</b> (formally Calvin Capital Group Holdings Limited)	Reg No: 10504732
<b>Calisen Holdco Limited</b> (formally Calvin Capital Holdco Limited)	Reg No: 10173259
<b>Calisen Holdco 2 Limited</b> (formally Calvin Capital Group Limited)	Reg No: 10174142
<b>Calvin Capital Australia Holdings Limited</b>	Reg No: 10654168
<b>Calisen Holdco 3 Limited</b> (formally Calvin Capital UK Holdings Limited)	Reg No 10174809
<b>Calvin Capital UK Limited</b>	Reg No 06312174
<b>Calvin Capital Limited</b>	Reg No 06312177
<b>Meter Serve (Holdco) Limited</b>	Reg No 11638594
<b>Meter Serve (North East) Limited</b>	Reg No 04410547
<b>Meter Fit (North East) Limited</b>	Reg No 04410548
<b>Meter Serve (North West) Limited</b>	Reg No 04345745
<b>Meter Fit (North West) Limited</b>	Reg No 04345746
<b>Meter Serve 2 Limited</b>	Reg No 07126644
<b>Meter Fit 2 Limited</b>	Reg No 07133661
<b>Meter Serve 3 Limited</b>	Reg No 07280889
<b>Meter Fit 3 Limited</b>	Reg No 07280893
<b>Meter Serve 4 Limited</b>	Reg No 08698160
<b>Meter Fit 4 Limited</b>	Reg No 08698368
<b>Meter Serve 5 Limited</b>	Reg No 09708951
<b>Meter Fit 5 Limited</b>	Reg No 09709451
<b>Meter Serve 10 Limited</b>	Reg No 09919385
<b>Meter Fit 10 Limited</b>	Reg No 09919526
<b>Meter Serve 20 Limited</b>	Reg No 09919390

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<b>Meter Fit 20 Limited</b>	Reg No 09919624
<b>Meter Fit Assets Limited</b>	Reg No: 07423439
<b>Calvin Asset Management Limited</b>	Reg No 07246723
<b>Calvin Metering Limited</b>	Reg No 09887083
<b>Lowri Beck Holdings Limited</b>	Reg No 4347790
<b>Lowri Beck Services Limited</b>	Reg No 3364728
<b>Lowri Beck Solutions Limited</b>	Reg No 6371746
<b>Lowri Beck Systems Limited</b>	Reg No 5234356
<b>Lowri Beck Direct Limited</b>	Reg No 9225009
<b>Lowri Beck Software Limited</b>	Reg No 3822548
<b>Lowri Beck Meters Limited</b>	Reg No 8465587
<b>Calvin Capital Australia Pty Limited</b>	ACN 618 033 944
<b>Calvin MS Australia 1 Pty Limited</b>	ACN 618 035 591