

## Modern Slavery Act 2015

### Plug Me In Limited

# Modern Slavery and Human Trafficking Statement

#### Introduction

This statement sets out the approach taken by Plug Me In Limited (Reg No 13515633) and Plug Me In (Heat) Limited (Reg No 13048116) in England and Wales 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").

Plug Me In Limited and Plug Me In (Heat) Limited (together "Plug Me In") provide Electric Vehicle ("EV") charge point and Heat Pump installation services.

Plug Me In is committed to improving its practices to combat modern slavery and human trafficking.

#### Our business and structure

Plug Me In is an accredited EV charge point installation business providing nationwide installation services for energy suppliers, EV charge point manufacturers, fleets, businesses and the general public. Plug Me In utilises several supply chains to achieve this.

Plug Me In is part of the Calisen Group (Holdings) Limited ("Calisen") group of companies. As is common with businesses that operate as a group, a number of back office and support functions are performed at group level, rather than within each individual entity. References to some of the policies, practices and procedures set out below may be conducted on behalf of Plug Me In by another group entity.

#### Plug Me In's supply chains

As an expanding business with a number of suppliers, Plug Me In recognises that there is a risk (however small) of modern slavery or human trafficking occurring in its supply chains. Plug Me In takes a zero-tolerance approach to modern slavery and human trafficking and adheres to the strictest behaviours and standards and expects the same of its suppliers. Plug Me In 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.

#### Plug Me In's policies

Plug Me In 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. Plug Me In reviews all of its policies on a regular basis to ensure that they are fit for purpose and uploads them to its online document management portal for all employees to access.

As part of the Calisen group of companies, Plug Me In has adopted the following Calisen group policies relating to supplier procurement and management:

- (1) Calisen Group Vendor Management Policy;
- (2) Calisen Vendor Management Security Policy; and
- (3) Calisen Group Code of Conduct for Vendors.



As highlighted in the Calisen Group Code of Conduct for Vendors, it is a fundamental requirement of Plug Me In to conduct its business with integrity and in accordance with the highest standards of ethics, equity and fair dealing.

Plug Me In is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

The Calisen Vendor Management Policy also reflects Plug Me In's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains. Alongside the Calisen group policies, Plug Me In 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 modern slavery and human trafficking**

Plug Me In operates within the principles (whilst not currently certified itself) 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 Plug Me In's recruitment and on-boarding process, it ensures 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.

Plug Me In sources a wide variety of items from a range of suppliers and works to ensure that the items provided are to the highest safety standards and best meet the needs of its business. This includes items such as company vehicles, uniforms, tools and IT hardware. Plug Me In also contracts with suppliers who provide services such as waste management.

Plug Me In utilises group procurement functions and established policies and procedures when onboarding new suppliers.

As part of Plug Me In's approach to combat modern slavery and human tracking, typically a number of physical site visits to suppliers are undertaken in each financial year. When physical audits are not possible, virtual audits of selected suppliers are being undertaken to ensure compliance with the Act in accordance with Plug Me In's standards.

### **Vendor adherence to Plug Me In's values**

Plug Me In believes that it is important for all third parties that it works with to morally align with Plug Me In's corporate values, to ensure that such organisations can build long term and mutually beneficial relationships. As part of Plug Me In's due diligence process, it ensures that all organisations who are engaged each have an equivalent Modern Slavery and Human Trafficking Statement in place that are easily accessible to other third parties.

### **Training**

Plug Me In is implementing an online training program on modern slavery to increase awareness amongst all staff. All new starters will complete this training on joining Plug Me In and all existing staff will be required to complete this training every two years



### **Plug Me In's effectiveness in combating modern slavery and human trafficking**

As a service business, Plug Me In works 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 Plug Me In has highlighted as its higher risk areas:

- EV charge points and heat pumps – the EV charge points and heat pumps installed by Plug Me In are either provided as part of its contractual arrangements with third party suppliers, or direct from reputable wholesalers. Plug Me In ensures that all necessary steps are taken with suppliers to be assured that the EV charge points and heat pumps 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 Plug Me In provides the majority of its workforce with Plug Me In uniforms and Personal Protective Equipment (PPE), Plug Me In utilises its due diligence checks and contractual agreements to maintain effective controls and ensure that all relevant parties adhere to the necessary regulations and minimise all identified risks;
- IT hardware – across Plug Me In, 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 Plug Me In uses is not linked to this type of issue, only reputable suppliers and brands are engaged and Plug Me In'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;
- visas and work permits – As part of the diverse workforce at Plug Me In, 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 managed by the Group's internal Human Resources system on behalf of Plug Me In, 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**

Plug Me In 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 Plug Me In Limited's Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2022.

This statement has been approved by Plug Me In Limited's board of directors and will be reviewed annually.

Approved by the Board: 19 January 2023

Signed by: Sean Latus:

Group Chief Executive Officer

