



Group Forced Labour and Modern Slavery Policy

17 June 2022

Private and confidential

Bboxx Group Policy

Type of policy:	Bboxx Group
Bboxx entities subject to this policy:	Bboxx Group Entities
Governance Areas Addressed:	<ul style="list-style-type: none"> - Forced Labour - Modern Slavery - Supply Chains - Bribery and Corruption - Fraud - Conflicts of Interest
Approving Authority:	General Counsel & Global Head of Compliance
Reviewed by:	<ul style="list-style-type: none"> - General Counsel & Global Head of Compliance - Global Head of Internal Audit
Prepared by:	Legal Team
Date of Approval:	17 June 2022
Frequency of Review or Update:	Annual
Date of Next Review:	16 June 2023
Version Number:	V.2
Related Policies:	<ul style="list-style-type: none"> - Group Business Integrity Policy - Group Whistleblowing Policy

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1 Introduction

At Bboxx we are committed to combating energy poverty across the globe in line with our core values of **ambition, trust** and **openness**. We make a continual and active commitment to preventing, monitoring and punishing breaches of the policies outlined in this document. Bboxx states unequivocally that it is our policy to conduct all business with integrity.

2 Policy Statement

2.1 Forced labour and modern slavery

Forced labour and modern slavery are crimes and violations of fundamental human rights. They take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

2.2 A zero-tolerance approach

We have a zero-tolerance approach to forced labour and modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure forced labour and modern slavery are not taking place anywhere in our business or in any of our supply chains.

2.3 Transparency

We are committed to ensuring that there is transparency in our approach to tackling forced labour and modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, in our supply and contracting processes, including informing our suppliers of our expectation that they will hold their own suppliers to the same high standards.

3 About this policy

3.1 The purpose of this policy is to:

- a) Set out our responsibilities, and the responsibilities of those working for and on our behalf, in observing and upholding our position on forced labour and modern slavery; and
- b) Provide information to those working for and on our behalf to assist with identifying and reporting concerns regarding forced labour and modern slavery.

3.2 This policy applies to all persons working for us

This policy applies to all persons working for us, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

3.3 This policy does not form part of any employee's contract

This policy does not form part of any employee's contract of employment and we may amend it at any time.

4 Responsibility for the policy

4.1 The Board of directors

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

4.2 The General Counsel & Global Head of Compliance

The General Counsel & Global Head of Compliance has primary day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in countering forced labour and modern slavery.

4.3 Management at all levels

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on the issue of forced labour and modern slavery in supply chains.

4.4 Everyone

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the General Counsel & Global Head of Compliance.

5 Your responsibilities and how to raise a concern

5.1 You must ensure that you read

You must ensure that you read, understand and comply with this policy.

5.2 The prevention, detection and reporting of forced labour

The prevention, detection and reporting of forced labour and modern slavery in any part of our business or supply chains is the responsibility of all those working for us and under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

5.3 Raise concerns

You are encouraged to raise concerns about any issue or suspicion of forced labour or modern slavery in any parts of our business, or supply chains of any supplier tier, at the earliest possible stage.

5.4 A breach of this policy

If you believe or suspect that a breach of this policy has occurred or that it may occur you must either notify the General Counsel & Global Head of Compliance or make a report in accordance with our Group Whistleblowing Policy, as soon as possible.

5.5 Welfare and safety of local workers as a priority

You should note that, where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

5.6 Unsure

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes forced labour or modern slavery, you should raise this with your line manager.

5.7 Openness

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that forced labour or modern slavery of any form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the General Counsel & Global Head of Compliance immediately.

6 Training and communication

6.1 Training

Training on this policy, and on the risk our business faces from forced labour and modern slavery in supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

6.2 zero-tolerance approach

Our zero-tolerance approach to forced labour and modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of a business relationship with them and reinforced as appropriate on an ongoing basis.

7 Breaches of this policy

7.1 Any employee

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

7.2 Termination

We may terminate our relationship with other individuals and organisations working on our behalf, including suppliers, if they breach this policy.