

Modern Slavery Statement 2023-24

This FY 2023/2024 statement sets out myenergi actions and commitments

Introduction

This statement sets out myenergi's commitment and actions to understand all potential modern slavery risks related to its business and to put in place steps to mitigate the risk of slavery or human trafficking in its business operations, partnerships and supply chain.

This statement outlines the actions undertaken in our financial year spanning 1st June 2023 to 31st May 2024.

Organisational Structure

Myenergi is a UK based private company headquartered in North East Lincolnshire, specialising in the design, manufacture and sale of smart home energy technology products. The company premises include a manufacturing facility, warehousing and office functions operating from five sites. At this time the company employed 291 people in the United Kingdom.

The subsidiaries within our group are based in Ireland , Benelux, Australia and Germany .

Our supply chains

Myenergi work with over 200 suppliers, of which 72% of stock suppliers are based in the United Kingdom. The company also source stock components and services from East Asia including China (17%), Europe (5%) and the United States (4%). Myenergi deliver products and services to tens of thousands of individual households and businesses through an in-house installation team, third-party installers and wholesale distributors.

We consider two key categories of suppliers :

- Stock - those suppliers who provide goods / services directly related to the manufacture of our products
- Non-stock - those suppliers who are not suppliers within the product supply chain and contribute to our business through other means eg, IT services, cleaners, consultants, office supplies, installation and distribution.

Our policies

We are committed to making every effort to identify and combat modern slavery or human trafficking in our supply chains or in any part of our business operations and relationships. In response to the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place a designated Modern Slavery Policy to support our Whistleblowing Policy which allows staff to report any issues of concern. This includes any circumstances which may give rise to an enhanced risk of slavery or human trafficking in our supply chains and operations. Any issue raised related to modern slavery will be taken seriously and thoroughly investigated.

Our Modern Slavery Policy demonstrates our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure the risk of slavery and human trafficking is understood and that measures are in place to enable the business to work to remove modern slavery from our supply chain and partnerships.

Other policies and documents currently implemented which support our ability to address potential modern slavery risk include:

- Anti-Bribery and Corruption (ABC) policy
- Whistleblowing policy

Due diligence processes

Within the electronics industry, both the sourcing of materials and components and the manufacturing of electrical equipment are known to have instances of human rights abuse. For example, through the use of child labour and forced labour in the cobalt mines of the Democratic Republic of Congo or the forced labour suffered by workers in the electrical assembly and processing lines in China.

We understand that our biggest exposure to Modern Slavery is in our product supply chains. In December 2022 the Wilberforce Institute at the University of Hull conducted a desk review of our key suppliers with the aim of identifying potential modern slavery hotspots in the regions and sectors in which Myenergi operates. From this research we have identified actions to strengthen our onboarding systems, policies and procedures so that we will be able to more effectively identify risks within our supply chains. Questions to suppliers will aim to identify labour management practices and processes, with a focus on training, monitoring and whistleblowing.

In February 2023 the Wilberforce Institute also conducted a modern slavery risk assessment of our manufacturing site.

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 have initiated internal training for our staff and

management teams on modern slavery.

Performance Indicators and Reporting

In our first statement for our financial year 2021/22, we outlined proposed Key Performance Indicators (KPI) to ensure that we are measuring how effective our efforts are to combat slavery and human trafficking in our business activities and supply chains. Following the work with the Wilberforce Institute these have been refined to include:

Internally focussed KPIs

- The number of incidences of modern slavery reported within myenergi own operations
 - The business has not received report of any incidents of modern slavery through the whistleblowing mechanism.
- The percentage of relevant employees trained on preventing modern slavery and trafficking – no specific training has been conducted on modern slavery in FY 23/24. In February 2023 employees from the Sustainability, Procurement and HR team received modern slavery training from the Wilberforce Institute, representing 30% of relevant employees.

We have improved our internal governance process with the creation of an ESG Committee in January 2024, which has within its scope oversight of the implementation of and compliance with our Modern Slavery Policy.

Externally focussed KPIs

- The percentage of suppliers aware of the Modern Slavery Act and its requirements
- The percentage of suppliers who have a Modern Slavery Policy
- The number of incidences of modern slavery reported in the supply chain
- The percentage of suppliers subjected to a modern slavery risk assessment/audit

The supplier desk review conducted by the Wilberforce Institute in December 2022 considered 103 top suppliers by spend. The results indicated that 40% of the suppliers were aware of the Modern Slavery Act, and 36.3% had a policy covering labour and human rights. However 67.6% of suppliers had a turnover below the legal threshold for compliance with the Act and are therefore not legally obligated to publish a policy.

We are yet to share our whistleblowing mechanism with suppliers or include modern slavery within our supplier audits.

Discussions with our staff and our management teams on how best to embed these KPIs across our business operations is ongoing.

Future Actions

We will continue to develop our systems and tools to analyse further our supply chains to combat the risks associated with the purchasing and distribution of our products and services. This includes, but is not limited to:

- Adding a reference to our Modern Slavery Policy within our approved supplier process. As such, all suppliers will be expected to fully reject the use of forced, bonded, or trafficked labour. We will also make our right to audit suppliers a requirement for business.
- Business checks during onboarding: We will continue to develop our supplier checks and supply chain monitoring and will work with our suppliers to further our understanding of risks.
- Addition of labour and human rights due diligence checks in supplier audits
- Training: Myenergi is committed to enhancing its training relating to its Modern Slavery Policy. As such, training for relevant employees will be further developed during the coming year.

Consultation

In preparing this statement consultation with internal teams including Sustainability, Procurement and Human Resources was carried out.

Board approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Myenergi slavery and human trafficking statement for the financial year ending 31 May 2024.

This statement has been approved by the organisation's board of directors and is signed on behalf of the Board by:

A handwritten signature in black ink, appearing to read "Andrew Clint".

Andrew Clint – Chief Executive Officer
Myenergi