



# Slavery and Human Trafficking Statement

SmartestEnergy Ltd

FY 2017-2018

# Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of SmartestEnergy Ltd and constitutes our slavery and human trafficking statement for the financial year ending 31st March 2017.

## Our company

SmartestEnergy Ltd (the "Company") is a wholly-owned subsidiary of Marubeni Corporation, one of Japan's largest trading and investment companies.

SmartestEnergy Ltd was established in 2001 and is now one of the UK's leading energy trading Companies operating in the independent power sector aiming to provide customers with flexible energy trading solutions. We are a value creating Company and through our employees we will continue our efforts to make a significant contribution to the growth and stability of the global company.

## Our principles and values

It is the Company's policy that management and employees must comply with the highest standards of business and ethical conduct in all dealings with customers, suppliers, government officials and the wider community.

The Company's core values, in common with all companies in the Marubeni Group, are fairness, innovation and harmony.

## Relevant policies

The meaning of modern slavery and the Company's commitment to the fight against modern slavery are expressed in our Modern Slavery Policy, accessible on our website at <http://www.smartestenergy.com/about-us/modern-slavery/>.

The Company is committed to taking steps where reasonably practicable to ensure that modern slavery is not taking place in any part of its own business or in any of its supply chains.

In January 2015 we established our Ethical Code for Partners, as referred to in our Modern Slavery Policy. This code is defined as the use of ethical business practices with a strong ethos concerning the rights of the individual. SmartestEnergy Ltd operate at all times in accordance with the principles of international standards and we select Partners who maintain a commitment to comparable ethics.

Other relevant policies of the Company are its Rules to Prevent Bribery, its Compliance Manual and its Corporate Social Responsibility Policy.

## The modern slavery risk

The creation of our Modern Slavery Policy in 2016 was the first step towards the Company having in place processes to:

- identify and assess potential risk areas in our supply chains;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains.

In 2016/2017 SmartestEnergy Ltd commenced a review of its business partners and supply line and has sought to gain assurance of their compliance with the Modern Slavery Act 2015.

Further initiatives are planned for 2017/2018 to ensure that companies who do business with us operate to the highest standards of ethical contact.

Whilst we have no information to suggest that modern slavery exists in our supply chain, we acknowledge that certain businesses may represent a higher degree of risk, and accordingly may require more detailed analysis and investigation.

Key members of our staff have attended training from external advisors on how to assess the risk of modern slavery in our supply chain and on compliance with the Act. Our ongoing Compliance Programme includes training on Modern Slavery, ensuring staff are aware of this threat.

We recognise that modern slavery may exist to a greater or lesser extent in most if not all countries and in most industries. The Company's business activities are limited to the UK and Europe but we also recognise that some of our supply chains may extend further and therefore may to some extent be at risk in respect of modern slavery.

Building on the work we have already put into practice, we will continue to develop our understanding of the risks mentioned above (and any other risks that we identify) and then, based on the severity of the risk and the influence we may have in the relevant supply chain, review and update our process for due diligence in preparation for the identified risk.

It is worth noting that we have established many long-standing relationships with suppliers and we consider that in many cases such long-term partnerships will involve less risk because each of us should have a better knowledge and understanding of each other's operations and policies.

## **Internal organisation in relation to modern slavery**

Compliance with the Modern Slavery Act will be the responsibility of the Regulatory Risk Team which reports directly to the Chief Operating Officer. Progress and activities relating to compliance with the Act will be reported on a monthly basis to the Chief Executive Officer and Chief Operating Officer who, along with the Board of SmartestEnergy Ltd, have overall responsibility for the Company's response to the challenge of slavery and human trafficking and, in accordance with the requirements of the Act, has signed this Statement below.

## **Declaration**

This Statement relates to the Company's financial year ended 31 March 2017 and, where noted, steps taken subsequently up to the date shown below.

Signed:



Robert Groves  
Director & CEO  
SmartestEnergy Ltd

Date: 28<sup>th</sup> September 2017