### Modern Slavery Act 2015

# Calvin Capital Slavery and Human Trafficking Statement for Financial Year 2018

#### Introduction

We are committed to improving our practices to combat slavery and human trafficking.

This statement sets out the approach taken by CCH1 Limited, Calvin Capital Group Holdings Limited and its Subsidiaries (as set out below and together, "Calvin") during the financial year ending 31 December 2018 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 Structure**

CCH1 Limited is the holding entity for the following subsidiaries (together "Subsidiaries" and each a "Subsidiary"):

Calvin Capital Group Holdings Limited

Calvin Capital Holdco Limited

Calvin Capital Group Limited

Calvin Capital Australia Holdings Limited

Calvin Capital Australia Pty Limited

Calvin MS Australia 1 Pty Limited

Calvin Capital UK Holdings Limited

Calvin Capital UK Limited

Calvin Capital Limited

Meter Fit Assets Limited

Calvin Asset Management Limited

Calvin Metering Limited

Meter Serve (Holdco) Limited

Meter Serve (North East) Limited

Meter Fit (North East) Limited

Meter Serve (North West) Limited

Meter Fit (North West) Limited

Meter Serve 2 Limited

Meter Fit 2 Limited

Meter Serve 3 Limited

Meter Fit 3 Limited

Meter Serve 4 Limited

Meter Fit 4 Limited

Meter Serve 5 Limited

Meter Fit 5 Limited

Meter Serve 10 Limited

Meter Fit 10 Limited

Meter Serve 20 Limited

Meter Fit 20 Limited

### Our business and our supply chains

We are an asset funding business investing in utility infrastructure assets.

As an expanding business with a number of suppliers (mostly meter manufacturers), Calvin recognises that there is a risk (however small) for slavery or human trafficking to occur in its supply chains. Calvin takes a zero tolerance approach to slavery and human trafficking and adheres to the strictest behaviours and standards and expect 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 on slavery and human trafficking

As highlighted in our values, it is a fundamental policy of Calvin 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.

Our Responsible Procurement Policy reflects our 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 out supply chains.

# Due diligence processes for slavery and human trafficking

Calvin 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.

Within our organisation, we have robust recruitment processes which include undertaking document checks on candidates prior to employment to evidence they are allowed 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. This involves placing obligations upon suppliers to conduct

regular modern slavery risk assessments within their own supply chains, implement appropriate controls to prevent modern slavery, and notify our organisation immediately if any supplier becomes aware of any modern slavery within their supply chains.

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

Calvin 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 business and supply chains. Calvin 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 Calvin 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. We are currently rolling out an online training program that has been developed by Thomson Reuters on modern slavery to increase awareness amongst staff. We anticipate all staff will have completed this training by 30 September 2019. This will provide our employees with knowledge on how to identify exploitation and modern slavery as well as the process for reporting suspected cases. We also encourage our business partners to arrange training for their staff, suppliers and providers.

# Our effectiveness in combating slavery and human trafficking

Our analysis suggests that the risk for Calvin 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 Calvin's standards.

A number of these site visits have been carried out in this financial year with more scheduled for 2019, including visits to some of the factories that are used to produce the meters that are purchased by Calvin. This involves a number of senior members of our staff visiting selected sites and performing extensive due diligence to ensure compliance with the Act in accordance with Calvin'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 2018.

This statement has been approved by CCH1 Limited's board of directors and each Subsidiary's board of directors and will be reviewed annually.

Director

Name: But Pulk

Date: 24 Hay 2019