

# **Modern Slavery Act 2015**

## **Calvin Capital UK Limited**

### **Modern Slavery and Human Trafficking Statement**

#### **Introduction**

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

This statement sets out the approach taken by Calvin Capital UK Limited (Reg No 06312174) and its subsidiaries in England and Wales (as set out below and together, "**Calvin**") 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 business and structure**

Calvin is almost exclusively a meter asset provider that procures, installs, owns and manages a growing portfolio of domestic electricity and gas meters, with a particular focus on smart meters.

Calvin Capital UK Limited is the holding entity of the following subsidiaries:

|   |                 |
|---|-----------------|
| <b>Calvin Capital Limited</b>           | Reg No 06312177 |
| <b>Meter Serve (Holdco) Limited</b>     | Reg No 11638594 |
| <b>Meter Serve (North East) Limited</b> | Reg No 04410547 |
| <b>Meter Fit (North East) Limited</b>   | Reg No 04410548 |
| <b>Meter Serve (North West) Limited</b> | Reg No 04345745 |
| <b>Meter Fit (North West) Limited</b>   | Reg No 04345746 |
| <b>Meter Serve 2 Limited</b>            | Reg No 07126644 |
| <b>Meter Serve (Holdco 2) Limited</b>   | Reg No 12598014 |
| <b>Meter Fit 2 Limited</b>              | Reg No 07133661 |
| <b>Meter Serve 3 Limited</b>            | Reg No 07280889 |
| <b>Meter Fit 3 Limited</b>              | Reg No 07280893 |
| <b>Meter Serve 4 Limited</b>            | Reg No 08698160 |
| <b>Meter Fit 4 Limited</b>              | Reg No 08698368 |
| <b>Meter Serve 5 Limited</b>            | Reg No 09708951 |
| <b>Meter Fit 5 Limited</b>              | Reg No 09709451 |
| <b>Meter Serve 10 Limited</b>           | Reg No 09919385 |

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| <b>Meter Fit 10 Limited</b>            | Reg No 09919526  |
| <b>Meter Serve 20 Limited</b>          | Reg No 09919390  |
| <b>Meter Fit 20 Limited</b>            | Reg No 09919624  |
| <b>Meter Fit Assets Limited</b>        | Reg No: 07423439 |
| <b>Calvin Asset Management Limited</b> | Reg No 07246723  |
| <b>Calvin Metering Limited</b>         | Reg No 09887083  |

### **Calvin's supply chains**

Calvin invests and manages utility infrastructure assets.

As an expanding business with a number of suppliers, Calvin recognises that there is a risk (however small) for modern slavery or human trafficking occurring in its supply chains. Calvin 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. Calvin 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.

### **Calvin's policies**

Calvin's current policies relating to supplier procurement and management are as follows:

- (1) Calvin Capital Supplier Management Policy;
- (2) Calvin Capital Responsible Procurement Policy; and
- (3) Calvin Asset Management Limited Procurement and Corporate Responsibility – Code of Conduct for Suppliers

As highlighted in policy (3), it is a fundamental requirement of Calvin to conduct its business with integrity and in accordance with the highest standards of ethics, equity and fair dealing.

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

Policy (2) also reflects Calvin's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in its supply chains.

### **Due diligence processes for modern slavery and human trafficking**

Calvin has taken appropriate steps to help ensure that modern slavery or human trafficking has not taken place in its supply chains and in any part of its own business.

Internally, Calvin has robust recruitment processes which include undertaking document checks on candidates prior to employment to evidence that they are permitted 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 its supply chains, Calvin has reviewed its contractual arrangements with current and prospective suppliers to ensure they comply with the Act. This involves placing obligations upon suppliers to conduct modern slavery risk assessments within their own supply chains, implement appropriate controls to prevent modern slavery, and notify Calvin immediately if any supplier becomes aware of any modern slavery within their supply chains.

As part of Calvin's initiative to identify and mitigate risk, it: 1) is conducting a further review of its procurement processes; 2) is conducting a further review of its due diligence processes; 3)

acknowledges the need to map its supply chains to identify the parts of the supply chains where the risks are most severe or most likely to occur; and 4) has adopted processes to identify and assess potential risk areas in our supply chains. This involves consideration of the geographical location where its 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 Calvin's 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 modern slavery and human trafficking in their respective businesses and supply chains. Calvin will not support or engage suppliers where it is aware of modern 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 its supply chains and business, Calvin has rolled out an ongoing online training program on modern slavery, developed by Kallidus, to increase awareness amongst all staff. All new starters must complete this training on joining Calvin and all existing staff will be required to complete this training every two years.

### **Calvin's effectiveness in combating modern slavery and human trafficking**

Calvin's analysis suggests that the risk for Calvin of involvement in modern slavery and human trafficking is low on the basis that it conducts extensive due diligence processes on its supply chains and its supply chains are established suppliers that have in place significant due diligence processes. When dealing with suppliers operating in jurisdictions outside the United Kingdom, Calvin implements a full assessment on their compliance with, amongst others, the Act and, if appropriate, Calvin requires a site audit of those suppliers to ensure their compliance with Calvin's standards.

As part of Calvin's approach to combatting modern slavery and human tracking typically a number of physical site visits to suppliers (including at international locations) are undertaken in each financial year. However, due to COVID 19 such physical visits have not always been possible in 2021 and therefore Calvin has adapted its approach. Some audits have been undertaken in person and virtual audits of selected suppliers have been undertaken when a site visit has not been possible to ensure compliance with the Act in accordance with Calvin's standards.

### **Further steps**

Calvin 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 Calvin's Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2021.

This statement has been approved by Calvin Capital UK Limited board of directors and will be reviewed annually.

Signed:

Date: 8 March 2022

Sean Latus

Director

