Modern Slavery Statement

Version: 1.0

Document Classification:

AMBER – LIMITED DISCLOSURE
# DOCUMENT CONTROL

## VERSION HISTORY

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<td>First draft sent to P Cooper</td>
<td>David Gillies</td>
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<td>Final</td>
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<td>Paul Cooper</td>
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## REVIEW HISTORY

- **Reviewed by**: Peter Berry  
- **Review date**: 28/3/22  
- **Approved by**: Paul Cooper  
- **Approval date**: 01/04/22  
- **Published date**: 01/04/22
Modern Slavery Statement

1. This Modern Slavery Act statement is made pursuant to section 54 of the Modern Slavery Act 2015 for the financial year ending 31 March 2022 and has been approved by the Managing Director of the Alternative HAN Company (“Alt HAN Co”).

Background

2. Alt HAN Co is a not-for-profit company jointly owned by Energy Suppliers. It operates through a Forum of supplier representatives, and a Board. Costs are recovered from energy consumers, via charges levied on all licensed energy suppliers. We work in a complex, multi-stakeholder environment.

3. We were established in 2016 for the sole purpose of finding an industry-wide solution for smart metering in hard-to-reach houses, apartment blocks and commercial premises. Specifically, where the broadcast signal from a smart meter is not strong enough to reach the gas meter or smart devices in the home. This problem affects around 5% of premises – and if not addressed could leave behind more than a million customers in the transition to a smarter, low-carbon energy sector.

Our commitment

4. We recognise that we currently live in a world where slavery and human trafficking happens, and we will take all necessary steps to eradicate the occurrence of these practices in our supply chain.

5. We will ensure our policies and procedures are robust, transparent and promote ethical business practices.

6. Should any evidence of modern slavery and/or human trafficking be found we will not hesitate to take appropriate immediate action.

About our policies

7. We believe combating modern slavery and working ethically starts with us, we therefore have a suite of policies and procedures in place to support this including:
   a. We are an equal opportunity employer.
   b. No forced labour is used.
   c. We ensure all employees are at least 18 years of age and are eligible to work in the UK via independent pre-employment ID checks.
d. All employees receive annual training appropriate to their job role, including employee wellbeing.

e. We provide a safe working environment and publish a Health & Safety policy.

f. All full-time employees work a Monday to Friday daytime 37.5-hour week contract, with flexible working arrangements including working from home.

g. We pay the Real Living Wage and plan to become an accredited employer.

h. We do not operate zero hours contracts; and

i. We have a whistleblowing policy in place.

**Our Due Diligence**

8. We extend our commitment to our suppliers by making them aware of our policies and expect the same standards in return.

9. Our core suppliers are expected to meet the requirements of the Real Living Wage annually and are encouraged to have their own Modern Slavery procedures in place.

10. A risk assessment is in place for potential new suppliers before engagement and we monitor this when working with them. We do this to ensure standards are met, highlight areas of potential risk in our supply chain and reduce the risk of slavery and human trafficking occurring.

**Our Risk and Compliance**

11. We consider ourselves to be low risk due to operating in the low-risk energy sector. If a risk was identified in a potential new supplier, we would investigate further and not commence activity with that supplier until reassurances were received that our standards were being met.

12. Should evidence of slavery or human trafficking come to light with an existing supplier (or customer) we would review our relationship and seek to find an alternative supplier.

**Our Effectiveness and KPIs**

13. We keep the risk of modern slavery occurring under constant review in our day-to-day business and by performing an annual assessment. Our target is simple. We will always seek to be fully complaint.

**Additional information**

14. Please speak to Human Resources if you have any questions about this Modern Slavery Statement or have any concerns about its application within Alt HAN Co.
Signed.

Paul Cooper
Managing Director
Alt HAN Co Limited

1st April 2022

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