

# Modern slavery and human trafficking statement

## Introduction

This statement sets out Smart Energy GB's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

### 1. Purpose of this statement

This statement, which has been approved by the Board of Smart Energy GB, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking statement for the financial year ending 31 December 2025.

We want every member of our extended team to feel excited about working with us, and that their hard work is recognised as making a difference. We want to treat everyone we deal with fairly and give everybody equal opportunities. We will always act ethically, honestly, and in full compliance with all laws and regulations. We have a zero-tolerance approach to any form of modern slavery and are committed to establishing effective systems and controls to safeguard against any form of modern slavery or human trafficking in our supply chain.

### 2. Who are we and what do we do?

Smart Energy GB is the trading name of Smart Metering Communications Body Limited, which is a company registered in England and Wales. Smart Energy GB, is the voice of the national smart meter rollout (for more information about the rollout, see [About Smart Energy GB](#)).

#### Core information:

Our company registration number: 8455995.

Organisational size: c70FTEs and a 2026 budget of £38m.

Registered office: 22 Lavington St, London, SE1 0NZ.

VAT registration number: 162 3606 26.

References to ("we", "us" or "our") in this statement are references to Smart Energy GB.

### 3. Organisational structure and supply chain

Our key suppliers are creative and media advertising agencies, research companies, technology service providers and software service providers that operate in the United Kingdom. Modern forms of slavery and human trafficking are not prevalent in the industries in which these suppliers operate. We expect the same high standards as those to which we hold ourselves from those businesses with which we work.

The territory of our campaign activity is Great Britain.

### 4. Risk assessment, monitoring and evaluation

We have considered the risk that the organisation is exposed to. We believe the nature of our work, our supply chains and their industries to be low risk in terms of modern slavery and human trafficking.

We will continue to monitor this risk as part of our general risk management approach across the organisation that includes regular reviews of the corporate risk register throughout the year by the Board and Audit and Risk Committee.

### 5. Organisational Policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Behaviour at work** Our behaviour at work policy makes it clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour during day-to-day operations and managing its supply chain.
- **Procurement policy and Code of business conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. All new suppliers are required to sign

our code of business conduct which includes a specific requirement for them to adhere to the Modern Slavery Act. Serious violations of our code of business conduct will lead to the termination of the business relationship.

- **Contract for the supply of recruitment services** We use only specified, reputable employment agencies to source temporary staff and always verify the practices of any new agency we are using before accepting workers from that agency. All recruitment agencies are required to sign our contract for the supply of recruitment services which includes a clause which requires them to comply with the Modern Slavery Act 2015.
- **Whistleblowing policy** We are committed to the highest standards of openness, probity and accountability. In line with that commitment, we have implemented a whistleblowing policy and procedure to cover the genuine concerns that an employee may have about suspected wrongdoing within the organisation. In demonstrating this commitment, we encourage employees who have serious concerns about any wrongdoing within the organisation to come forward and express their concerns. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees wishing to make a disclosure should do so in the first instance to their line manager. If the disclosure is about the line manager then the disclosure should be made to the Chief Executive. If, for any reason, an employee would prefer to do so, they can make a disclosure directly to the Chairperson of the Board or the Chair of the Audit and Risk Committee.

## 6. Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence includes:

- All procuring managers are required to consider the risk, and put appropriate checks in place to ensure suppliers are complying with the Modern Slavery Act.
- We are an accredited Living Wage employer, we pay all our employees, regardless of the location with Great Britain, at least the London Living Wage and require that any contractors do the same.

- We are continuing to ensure that all new suppliers sign our updated code of business conduct and adhere to the Modern Slavery Act 2015. We are reviewing all existing suppliers to ensure they have also complied with the Modern Slavery Act.
- We will continue to review our policies and processes to ensure we are doing everything we can to ensure our zero-tolerance approach to modern slavery in our business and supply chain.

## 7. Training

Staff undergo mandatory training on Modern Slavery once a year. Supplementary support and guidance are available from the operations team, particularly as that team supports procurement activity.

## 8. Board approval

This statement was approved on **6 Feb 2026** by the Board of Smart Energy GB.