

Xoserve Modern Day Slavery Statement 2020/21

Statement on the Prevention of Slavery and Human Trafficking in Xoserve Limited.

Introduction

Xoserve Limited is committed to preventing slavery and human trafficking in its business and supply chain, in accordance with the UK Modern Slavery Act. This statement highlights the steps that Xoserve has already taken to address any risks, and our planned improvements.

Xoserve's organisational Structure, Business Model and Supply Chains

Founded on 1st May 2005, Xoserve is central to Britain's gas distribution market. Operating at the heart of the gas industry; we offer a single consistent point of service for our customers and ensure their data is transported securely. As the gas industry's Central Data Service Provider (CDSP), we deliver a full suite of vital services to gas suppliers, shippers and transporters, and ensure that Britain's retail gas market runs efficiently and reliably for all our customers.

We are funded, governed and owned by the gas industry, with our board made up of industry-nominated directors and an independent Chair.

Xoserve is based exclusively in Great Britain however some parties which benefit from our services are based overseas. Xoserve also makes significant use of IT services from major companies based in India.

Our Policies to Address the Risks of Slavery and Human Trafficking

At Xoserve, ethical conduct and behaving as a responsible business underpins everything.

Staff are expected to follow the principles set out within Xoserve's guide to ethical business conduct "**Doing the Right Thing.**" This sets out the ethical and conduct codes which our staff, partners and others we work with must comply. In addition, Xoserve provides an external helpline to enable staff to report any concerns or issues in complete confidence.

The Employee Code of Conduct sets out the appropriate behaviour that our people should adopt; to ensure a safe and effective workplace where positive employment relationships can be maintained.

The Supplier Code of Conduct outlines the standards of ethical business conduct expected from the Xoserve supply chain. Suppliers must operate ethically within the law providing safe working conditions that prevent harm, intimidation, harassment and fear and where staff are treated with dignity and respect.

Our recruitment policies and processes recognise an individual's rights to work in an environment free from discrimination and to realise their full potential by ensuring equal opportunities at work. We ensure that all direct employees are paid above the minimum living wage and have appropriate rights to work.

Xoserve recognises the need to embrace Inclusion & Diversity, and there is now an increasing drive to embed Inclusion and Diversity into the Xoserve culture, business models and employee lifecycle.

Our Processes to Identify and Reduce the Risk of Slavery and Human Trafficking Taking Place in Our Supply Chains or Operations

When onboarding new suppliers, and annually thereafter, Xoserve operates the following control and assurance framework to identify and reduce the risk of slavery and human trafficking:

- Pre-qualification questionnaires
- Thomson Reuters World Check, for supplier due-diligence and risk intelligence
- Contractual obligations compliant with all applicable current laws and regulations

Our Ongoing Commitment to Eradicating Slavery and Human Trafficking

Xoserve's approach continues to be to detect any instances of trafficking or slavery being recorded within our supply chain or business.

In our previous statement published in August 2019, Xoserve committed to review its training content in relation to Modern Slavery and to extend delivery of the course to all of its staff via the Xoserve Academy. The Academy has now been launched and the mandatory training will be made available in 2020. During the next 12 months Xoserve will deliver its enhanced Modern Slavery awareness training to all Xoserve staff.

Xoserve also committed to look at how we could further improve our effectiveness in managing compliance with the Act and have recently engaged with a global procurement network, allowing us to explore best practice and collaborate on peer reviews to help drive further policy and process improvements and enhance our compliance.

Category Management has been developed during 2019, taking advantage of the Market and Supply Chain Intelligence now available through our new collaboration and will lead to a greater understanding of risks associated with the products & services we procure and the markets we serve.

The Supplier Code of Conduct is reviewed annually and updated regularly, with the latest version being released to existing and new suppliers from September 2019 and includes updates to Work and Human Rights references and Xoserve's expectations.

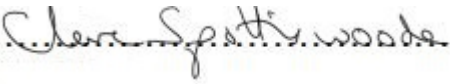
Xoserve will continue to invest in the business tools our people work with and their training and in process optimisation and to further develop our working practices to drive change in our supply chain governance, procurement activities and supplier relationship management.

Over the coming year enhancements will be made to the mapping of Modern Slavery risk, and to our compliance monitoring of our supply chain. Proactive approach to identifying risk through the use of questionnaires and audit will be adopted. Xoserve continues to explore the use of new technology solutions and enhance our existing toolset to help drive this approach.

There has been increased focus on Inclusion and Diversity during 2019 and the next year will see Xoserve develop a companywide training approach to increase awareness of Inclusion and Diversity in the workplace and throughout our supply chain, with updates to the Supplier Code of Conduct in support of this approach. Xoserve currently has a more diverse workforce than ever and remains committed to evolving behaviours and processes to continually support and promote I&D and behave in a way which reduces unconscious bias and allows employees to thrive. The ultimate ambition is for Xoserve to be viewed as a company that leads the way on Inclusion and Diversity.

Board Statement

This statement is fully supported and approved by the Xoserve Limited Board of Directors and covers all activities undertaken by its business and its Supply Chain Partners in connection with its business.

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| Date: | 5 th August 2020 |
| Director's Signature: |  |
| Directors Name & Title: | Clare Spottiswoode, Chair |