

Xoserve Modern Day Slavery Statement 2021

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

Introduction

Xoserve Limited are 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 have 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 ensure the delivery 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 restructured to separate its business into two with effect from 1st March 2021. As a result of the restructure, Xoserve has switched its focus to become a specialised contract management company, maintaining its role as the CDSP, retaining accountability for delivery of the Data Services Contract (DSC) to Xoserve's customers. A new company, Correla Limited (Correla), was created by Xoserve as an independent business, to deliver services back to Xoserve through a commercial contract (known as the DSC+), and fuel innovation in the centre of the gas market. Correla was sold to an external investor, NorthEdge Capital LLP on 31st March 2021.

Correla will be Xoserve's main supplier, providing both CDSP-related services (under DSC+) and certain corporate services. A formal governance framework is in place to ensure the relationship between the two parties is appropriately managed.

The number of suppliers in Xoserve's supply chain has significantly reduced as a result of the novation of many contracts to Correla, aligned to scope. Xoserve continues to procure (and contract for) services on behalf of the gas industry, such as the Performance Assurance Framework Administrator (PAFA) and Allocation of Unidentified Gas Expert (AUGE).

As Xoserve's main Service Provider, Correla will have their own Modern Slavery statement.

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 provide an external helpline to enable staff to report any concerns or issues in complete confidence.

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 recognise the need to embrace Inclusion & Diversity, and we continue to drive to embed Inclusion and Diversity into the Xoserve culture, business models and employee lifecycle. Xoserve have delivered mandatory staff training on Inclusion and Diversity and will continue to provide training to all new employees as well as refresher training to all existing staff.

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 operate the following control and assurance framework to identify and reduce the risk of slavery and human trafficking:

- Pre-qualification questionnaires
- Refinitiv World-Check for supplier due-diligence and risk intelligence
- Contractual Obligations compliant with all applicable current laws and regulations
- Compliance with Supplier Code of Conduct
- Xoserve's Modern Slavery Statement or Suppliers own published statement

Our Ongoing Commitment to Eradicating Slavery and Human Trafficking

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

The learning and development platform Rise has now been launched and further mandatory training will be made available in Autumn of 2021 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 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 compliancy.

Market and Supply Chain Intelligence now available through our new collaboration with Correla will lead to a greater understanding of risks associated with the products & services procured 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 and includes updates to Work and Human Rights references and Xoserve expectations.

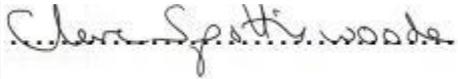
Xoserve will continue to invest in the business tools our people work with and their training, process optimisation and further develop our working practices with a view to driving change in our supply chain governance, procurement activities and supplier relationship management.

Xoserve will continue monitoring Modern Slavery risk and our compliance monitoring of our supply chain. Proactive approach to identifying risk through the use of supplier questionnaires has been adopted.

Xoserve continue to focus on Inclusion and Diversity and have developed 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 remain 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.

Board Statement

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

Date:	24/08/2021
Director's Signature:	
Directors Name & Title:	Clare Spottiswoode, Xoserve Chair