



Xoserve Modern Day Slavery Statement 2026

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

Introduction

Xoserve Limited is committed to preventing slavery and human trafficking within its business and supply chain, in accordance with the UK Modern Slavery Act 2015. This statement highlights the steps that Xoserve takes to address any risks and identify 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, Xoserve is the Central Data Service Provider (CDSP) on behalf of the gas industry. We have responsibility for the procurement, management, and delivery of vital services to gas suppliers, shippers and transporters, ensuring that their data is transported securely and that Britain's wholesale gas market runs as efficiently and reliably as possible.

We review our organisational structure and supply chain risk including consideration of:

- The specialist sector that the business operates in is ongoing with no seasonal work and no transient workforce.
- The organisation is funded, governed, and owned by the gas industry, with our board made up of industry-nominated directors and an independent Chair.
- Xoserve outsources the delivery of a large proportion of the CDSP-related services and a formal governance framework is in place to ensure the relationship between Xoserve and its service providers is appropriately monitored and managed.
- Xoserve also continues to procure (and contract for) services for its own use and utilises the same controls.

Our Policies to Address the Risks of Slavery and Human Trafficking

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

Our recruitment policies and processes promote equal opportunities and ensure that all individuals are treated fairly and can realise their full potential in a workplace free from discrimination. We carry out appropriate right-to-work and pre-employment screening checks, and ensure employees receive fair, market-aligned pay and benefits, which are reviewed annually.

Through our wellbeing strategy, we provide a range of initiatives that support the physical and mental wellbeing of our people.

Doing the Right Thing, our commitment to ethical business conduct is embedded within our policies, standards and ways of working. Employees can raise concerns



confidentially through internal reporting channels or an independent external whistleblowing helpline. All employees are required to confirm their understanding of and compliance with our policies during onboarding and annually thereafter.

Xoserve's Supplier Code of Conduct outlines the standards of ethical business conduct expected from our 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.

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

- Build long term relationships supporting ethical requirements.
- Initial assessment and ongoing monitoring of suppliers through recognised screening tools.
- Completion of pre-qualification supplier questionnaires (where relevant)
- Xoserve template contract includes contractual obligations for Supplier to comply with all applicable current laws and regulations and Supplier Code of Conduct.
- Compliance to the Supplier Code of Conduct or supplier's appropriate published statement which includes compliance with the Modern Slavery Act 2015.

Our Ongoing Commitment to Eradicating Slavery and Human Trafficking

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

Specialists in our Procurement and HR teams maintain awareness of current requirements of the Modern Slavery Act as part of their ongoing professional commitments. Membership of the Chartered Institute of Procurement and Supply (CIPS) also provide the Procurement and Contract Management teams with ongoing advice and updates.

Xoserve will continue to apply appropriate procurement and contractual processes with suppliers to confirm adherence to the Modern Slavery Act.

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.

Mike Hogg, Xoserve Chair

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