



Modern Slavery and Human Trafficking Policy Statement (2023/24)

1. Introduction

Modern slavery and human trafficking remain a hidden blight for 21st century society. For this reason, Crown Gas & Power (CGP)¹ is fully committed to the prevention of acts of modern slavery and human trafficking occurring within our business and supply chains pursuant to the Modern Slavery Act (2015). In accordance with Section 54 (1) of the Modern Slavery Act, we set out below our annual statement in alignment with our financial year ending on 31st July.

2. Structure and business operation

Crown Gas & Power (CGP) is a supplier of natural gas and electricity to business premises throughout mainland Great Britain. We also provide utility solutions, enabling us to connect businesses to nationwide infrastructure. Our company has over 110 contracted employees all of which operate from CGPs single location at Crown Point, Heap Brow, Bury, BL9 7JR.

More information about our operation can be found on the link below:

<https://www.crowngas.co.uk/about-crown-gas-power/>

To supply energy and provide a quality service to our business customers, all of our employees are required to have a documented contract of employment. We also work with reputable UK-based third-party service providers who support our business operation in the areas of metering, energy trading, network connections and IT services.

Operating within a highly regulated market, the potential for exposure of modern slavery and human trafficking occurring within the wider supply chain, whilst probable, constitutes a low risk. This stance will be reviewed annually in line with this statement as part of a risk assessment.

3. Policies

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chains. To demonstrate our commitment, we have implemented the following policies:

1. Modern Slavery and Human Trafficking
2. Anti-corruption and bribery policy
3. Modern Slavery Risk Assessment

Our modern slavery and human trafficking policies reflect our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems

¹ "Crown Gas & Power" is a generic reference to Crown Gas and Power Limited (registered in England and Wales under number 07980591), Crown Gas and Power Limited t/a as Epic Energy, Crown Gas & Power (Siteworks) Limited (registered in England and Wales under number 09727143) and Crown Gas and Power 2 Limited (registered in England and Wales under number 11357910).



and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

4. Due Diligence

CGP has a corporate responsibility to be alert to the risks, however small, posed in our business and in the wider supply chain. To support our commitment to the Modern Slavery Act, CGP has implemented a series of controls to monitor and reduce the risk of slavery and human trafficking occurring within our business and wider supply chain. Such controls are listed below and are proportionate in their scope and application to our operating size:

- Our products and services are limited to mainland Great Britain
- Contracts with service providers contain appropriate terms and can demonstrate compliance with the Modern Slavery Act 2015.
- Contracts of employment with all members of staff
- Monitoring potential risks in our supply chain as part of a risk assessment

The items above are designed to reduce the risk of modern-day slavery and human trafficking entering the supply chain. We expect each entity in the supply chain to, at least, adopt a 'one-up' due diligence on the next link in the chain. It is not practical for CGP (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

5. Risk Assessment

A regular risk assessment determines the geographic and high-risk industrial sectors that pose high risk to our supply chain. Following this, the scope of our risk assessment is focused on our direct supply chain and its links to countries found on the Freedom House list.

As CGP and its direct supply chain do not operate in either a high-risk geographical location or industry sectors, **we determine that the likelihood and probability of an instance of modern-day human slavery and human trafficking occurring is overall low.** Should an assessment identify a score of anything other than 'low' then our supplier will be contacted accordingly to resolve, and CGP will not support or deal with that supplier until corrective action has been taken.

6. Measuring Effectiveness

CGP expects all those in our supply chain to comply with our values. We will not support or deal with any business knowingly involved in modern slavery or human trafficking.

Overall effectiveness to help ensure that modern slavery or human trafficking is not taking place within our business or our supply chains will be measured through the delivery of mandatory training for those employees engaged with recruitment and service procurement. This delivery provides for a reasonable key performance indicator given our operating size and service provided.

7. Training



To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, the senior management team at CGP has made resources available to help raise awareness and support staff training. The objective of these actions is to ensure that employees are confident in identifying signs of slavery and human trafficking in the supply chain.

8. Endorsement

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and has been approved by a Director of Crown Gas and Power.

Terry Day
Director