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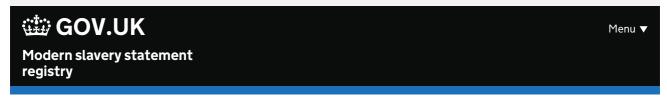
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OVO GROUP LTD modern slavery statement summary (2022)

Organisation address

We asked the organisation a series of questions about its modern slavery statement. Its answers are published on this page as a statement summary.

What is a modern slavery statement?

Link to full statement

Go to full modern slavery statement on organisation's website

PDF version of the statement (optional)

THERE IS NO PDF VERSION OF THIS

PDF statements were first introduced to the registry for the 2023 statement year.

About this statement summary

All answers relate to the financial year covered by the statement. The organisation is responsible for all the information it provided. Some of our questions are optional, so organisations may not have answered all of them. The statement – below we provide a link to the full modern slavery statement – below we provide a link to the full statement on the organisation's website.

Contents

- Organisations covered by the statement
- Statement period and sign-off details
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- The organisation's sectors and turnover
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- Training
- Monitoring working conditions
- Modern slavery risks
- Finding indicators of modern slavery
- Demonstrating progress

Organisations covered by the statement

OVO GROUP LTD modern slavery statement for 2022 is a group statement covering **10** organisations. <u>See the full list of organisations covered by this statement</u>

Statement period and sign-off details

The statement covers the following period: 1 January 2021 to 31 December 2021

The statement was signed off by: Raman Bhatia (CEO, OVO Energy)

It was approved by the board (or equivalent management body) on: 16 June 2022

Recommended areas covered by the statement

Government guidance encourages organisations to cover a range of areas in their modern slavery statements, setting out the steps they're taking to address modern slavery risks in their operations and supply chains. Read about the recommended areas in the statutory guidance.

We asked the organisation to tell us which areas its statement covers.

Areas recommended by government guidance	Organisation's response
The organisation's structure, business and supply chains	COVERED
Policies	COVERED
Risk assessment	COVERED
Due diligence (steps to address risk)	COVERED
Training about modern slavery	COVERED
Goals and key performance indicators (KPIs) to measure the effectiveness of the organisation's actions and progress over time	COVERED

Sectors

The organisation operates in the following sectors:

• Utilities: gas, water and electricity

Turnover

Its turnover in the financial accounting year of this statement was:

Over £500 million

If the organisation is a public body, this amount is based on the organisation's budget for the year of the statement.

What does 'turnover' refer to in group statements?

Number of years producing statements

The organisation has been producing modern slavery statements for the following number of years:

1 to 5 years

How does this work for group statements?

Policies (optional)

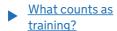
We asked the organisation whether its policies include the following provisions in relation to its domestic and international supply chains, as well as its own operations.

Policy provisions we asked about	Organisation's response
Freedom of workers to terminate employment	INCLUDED
Freedom of movement	INCLUDED
Freedom of association	INCLUDED
Prohibits any threat of violence, harassment and intimidation	INCLUDED
Prohibits the use of worker-paid recruitment fees	NOT INCLUDED
Prohibits compulsory overtime	INCLUDED
Prohibits child labour	INCLUDED
Prohibits discrimination	INCLUDED
Prohibits confiscation of workers' original identification documents	NOT INCLUDED
Provides access to remedy, compensation and justice for victims of modern slavery	NOT INCLUDED

Policy provisions we asked about	Organisation's response
Other	-

Training (optional)

We asked the organisation whether it provided training on modern slavery, and who it was for.



We asked who the training was for	Organisation's response
Your whole organisation	NO
Your front line staff	NO
Human resources	YES
Executive-level staff	NO
Procurement staff	YES
Your suppliers	NO
The wider community	NO
Other	Sustainability staff

Monitoring working conditions (optional)

Engaging with others

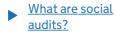
We asked the organisation to tell us who it engaged with to help monitor working conditions across its operations and supply chains.

We asked who the organisation engaged with	Organisation's response
Your suppliers	YES
Trade unions or worker representative groups	YES
Civil society organisations	YES
Professional auditors	NO
Workers within your organisation	NO
Workers within your supply chain	YES

We asked who the organisation engaged with	Organisation's response
Central or local government	NO
Law enforcement, such as police, GLAA and other local labour market inspectorates	NO
Businesses in your industry or sector	YES

Social audits

We asked the organisation to tell us about any social audits it used to look for signs of modern slavery.



Social audits we asked about	Organisation's response
Audit conducted by your staff	NO
Third party audit arranged by your organisation	NO
Audit conducted by your supplier's staff	NO
Third party audit arranged by your supplier	YES
Announced audit	NO
Unannounced audit	NO

Grievance mechanisms

We asked the organisation how workers in its operations or supply chains could raise concerns or make complaints.

We asked if workers could raise concerns this way	Organisation's response
Using anonymous whistleblowing services, such as a helpline or mobile phone app	YES
Through trade unions or other worker representative groups	YES

Other ways of monitoring working conditions

We asked the organisation whether it had any other ways of monitoring working conditions across its operations and supply chains:

Organisation's response

THE ORGANISATION DID NOT ANSWER THIS QUESTION.

Modern slavery risks (optional)



Identifying modern slavery risks is a vital step towards eradicating it. The government encourages organisations to be as open and transparent as possible, to improve understanding, collaboration and best practice around tackling this worldwide problem.

We asked the organisation to describe up to 3 priority risks it focused on during the period of the statement, including details of the affected workers, the activity involved, and the location.

Priority risks for this organisation (1 of 3)

Workers in the upward supply chain of electrical equipment

Questions we asked about this risk

Organisation's response

Where it was most likely to occur

Organisation's response: Within your supply chains.

• Tier 2 suppliers

Provide products and services to your organisation via your Tier 1 suppliers.

• Tier 3 suppliers and below

Provide products and services to your organisation via your Tier 2 suppliers or the next higher level in the chain.

Who was

Organisation's response:

it most likely to affect

- Women
- Migrants
- Refugees
- Children

In which country

Organisation's response: Congo

Actions or plans to address this risk

Organisation's response: OVO has a sustainable procurement process which new suppliers go through (if applicable) to assess and manage the risk of modern slavery. This is done through a questionnaire issued to the top suppliers and suppliers that operate in OVO's highest risk goods and service categories or regions. OVO also requires new suppliers to sign up to our Supplier Code of Conduct, which outlines the minimum standards suppliers are expected to uphold, including with respect to human rights and modern slavery.

Priority risks for this organisation (2 of 3)

Workers in outsourced operations in high risk regions

Questions Orga we asked about this risk

Organisation's response

Questions we asked about this risk

Organisation's response

Where it was most

Organisation's response: Within your supply chains.

• Tier 1 suppliers

likely to

Provide their products and services directly to your organisation.

Who was

Organisation's response:

it most likely to affect

- Women
- MigrantsRefugees
- Children

In which country

Organisation's response: South Africa

Actions or plans to address this risk

Organisation's response: OVO has a sustainable procurement approach for new suppliers to assess and manage the risk of modern slavery. This is done through a questionnaire issued to the top suppliers and suppliers that operate in OVO's highest risk goods and service categories or regions. The supplier contract contains express obligations on the supplier to pay a fair wage, employ over 18s and comply with modern slavery legislation. Our counter party is a large UK based organisation.

Priority risks for this organisation (3 of 3)

Workers in outsourced operations in high risk industries

Questions we asked about this risk

Organisation's response

Where it was most likely to occur

Organisation's response: Within your supply chains.

• Tier 2 suppliers

Provide products and services to your organisation via your Tier 1 suppliers.

• Tier 3 suppliers and below

Provide products and services to your organisation via your Tier 2 suppliers or the next higher level in the chain.

Who was

Organisation's response:

it most likely to affect

- Women
- Migrants
- Refugees
- Children

In which country

Organisation's response:

- Congo (Democratic Republic)
- China

Questions	Organisa
we asked	
about this	
risk	

Organisation's response

Actions of
plans to
address
this risk

or Organisation's response: OVO has a sustainable procurement approach for new suppliers to assess and manage the risk of modern slavery. This is done through a questionnaire issued to the top suppliers and suppliers that operate in OVO's highest risk goods and service categories or regions. OVO also engages with suppliers who have flagged potential risks in their supply chain to understand what mitigating actions they're taking. Suppliers sign our Supplier Code of Conduct which includes modern slavery legislation.

Indicators of forced labour (optional)

We asked the organisation whether its statement refers to finding any International Labour Organization (ILO) indicators of forced labour.

What are ILO indicators of forced labour?

Organisation's response

THE ORGANISATION TOLD US ITS STATEMENT DOES NOT REFER TO FINDING ANY INTERNATIONAL LABOUR ORGANIZATION (ILO) INDICATORS OF FORCED LABOUR.

Demonstrating progress (optional)

We asked the organisation how its statement demonstrates progress over time in addressing modern slavery risks. They provided the following answer:

We've developed a set of key performance indicators to monitor performance of OVO's modern slavery risk management initiatives. The indicators include: Key Tier 1 suppliers (Top 50 spend) aligned with our Supplier Code of Conduct; Applicable procurement led engagements that have a completed risk assessment; Number of modern slavery cases reported; Number of people in procurement roles that have completed training on modern slavery and sustainable procurement

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