

Xoserve Modern Day Slavery Statement 2018/19

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 have taken to address any risk of slavery and human trafficking taking place within its supply chain and throughout other areas of its business.

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 chaired by an independent Chair

Xoserve is only based 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

Xoserve approach to the risks of slavery and human trafficking can be found within a number of our policies.

Our employees 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 employees are expected to comply with. In addition, the principles set out in the document protect whistle-blowers. Hotlines are available to employees, to enable them to report any concerns or issues in complete confidence.

Xoserve also has a Code of Conduct in place for both employees and suppliers.

The Employee Code of Conduct sets out the appropriate behaviour that members of staff should adopt; in order to ensure a safe and efficient 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. It is expected that our supply chain provides safe working conditions that are free from harm, intimidation, harassment and fear and that workers should be treated with dignity, respect and act ethically within the law.

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

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

As well as using the policies and codes mentioned above, Xoserve also operate the following control and assurance framework in order to identify and reduce the risk of slavery and human trafficking:

When on boarding new suppliers Xoserve use:

Pre-qualification questionnaires

Thomson Reuters World Check, supplier due-diligence and risk intelligence

Contractual Obligations compliant with all applicable laws and regulations

Our Ongoing Commitment to Eradicating Slavery and Human Trafficking

A programme of training and awareness on the Modern Slavery Act 2015, its implications and what it means to day to day working practices is included in Xoserve's compliance programme. Modern slavery awareness is included in the induction programme attended by all employees when joining the organisation with further relevant training provided to employees where appropriate. Xoserve continue to review training content and delivery schedules to deliver further refresher training to all staff. Training is specifically focused on identifying and managing the risk of slavery and human trafficking for staff who are engaged in the management of our supply chain, purchasing policies and recruitment practices

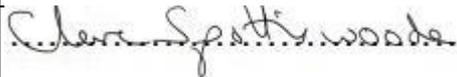
We have an ongoing review group led by our Assurance Team. This department is responsible for reviewing our processes and monitoring compliance. During the next financial year, Xoserve will continue to discover ways of making further improvements in relation to modern slavery and human trafficking.

Xoserve continue to invest in the business tools our people work with, and in their training, to help further improve our supply chain governance, procurement activities and supplier relationship management.

We are proud of our achievements so far and will continue to address modern slavery in our business and across our supply chain. Our approach to date has prevented any instances of trafficking or slavery being recorded within our supply chain or business.

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.

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| Date: | 12 th August 2019 |
| Director's Signature: |  |
| Directors Name & Title: | Clare Spottiswoode, Chair |