



Public Statement

ENSEK Ltd Modern Slavery Statement (Financial Year Ending 31 December 2024)

VERSION 1.0 | 10/06/2025



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1. INTRODUCTION

1.1 Scope

This statement is published in accordance with section 54 of the Modern Slavery Act 2015, and is a statement of the steps ENSEK has taken during its last financial year to ensure that slavery and human trafficking are not taking place in its supply chains or in any part of its own business.

1.2 Financial Year

The statement relates ENSEK's financial year ending 31st December 2024.

1.3 Commitments

- 1.3.1 ENSEK is committed to not using (whether directly or through its supply chain) any individuals who have been subject to slavery or human trafficking.
- 1.3.2 ENSEK is committed to conducting its business in a fair, honest and ethical manner, respecting fundamental human rights.

2. BUSINESS SUMMARY

This section sets out information about ENSEK's business.

2.1 Legal Entity

ENSEK Ltd is a company registered in England and Wales, with registered number 07167027 and registered office at Hounds Gate, 30-34 Hounds Gate, Nottingham, England, NG1 7AB.

2.2 Ownership

ENSEK became part the Centrica Plc group from 20th September 2024, but is not covered by the Centrica Plc modern slavery statement for 2024.

2.3 Subsidiaries

- 2.3.1 ENSEK did not have any operating subsidiaries during the financial year

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covered by this statement.

- 2.3.2 This statement does not cover any legal entities in which ENSEK holds any minority shareholding.

2.4 Location and Sector

ENSEK conducts business in Great Britain within the energy supply sector in Great Britain.

2.5 Services – ENSEK

- 2.5.1 ENSEK provides gas and electricity billing software-as-a-service, processing data relating to energy supply contracts for the supply of electricity and gas to residential and business premises in Great Britain.
- 2.5.2 ENSEK also provides a smart meter communication system which exchanges messages with smart meters through the Data Communication Company network.
- 2.5.3 ENSEK also provides outsourced services to: (a) provide technical support for its systems; (b) provide oversight of processes being managed by its systems; (c) support the handling of exceptions arising in associated industry processes; and (d) provide information to support its clients' energy accounting needs.

2.6 Services – ZOA

- 2.6.1 On 24th September 2024, ENSEK acquired the business and assets of Zoa Technologies Limited (now called Clean Energy Labs Limited), relating to their cloud service and mobile application that enables home users to monitor and manage home energy usage and optimise energy generation and storage assets.
- 2.6.2 They are operated as a separate business unit within ENSEK Ltd, and are not a subsidiary company.

2.7 Websites

ENSEK's websites are <https://ensek.com/> and <https://www.zoa.io/>.

3. STAFFING AND SUPPLY CHAIN

This section provides information about ENSEK employees and supply chain.

3.1 Own Staff

ENSEK's employees are all located within the UK, and ENSEK does not have employees

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located in or employed under other jurisdictions.

3.2 Cloud Services

- 3.2.1 As a software developer and SaaS provider, ENSEK's supply chain is mainly comprised of third party cloud services, including application, platform and infrastructure service providers.
- 3.2.2 For example, cloud services to host ENSEK's own products and services and cloud services providing key business systems, such as email systems, chat systems, security systems, document management and sharing systems, employee management systems, finance systems, software development systems, and management systems.
- 3.2.3 The data centres of these cloud services are almost all located in the UK, the EEA, or USA.

3.3 Data Centres

ENSEK uses UK based data centres for some of its smart meter related infrastructure, as required by the UK Smart Energy Code.

3.4 Developer Services

- 3.4.1 As a software developer, ENSEK partners with major international development companies to provide additional developer and other resources to support development of ENSEK's products and services, through the provision of individuals as developers, testers, managers, and in other roles.
- 3.4.2 The companies are located in the UK and EEA, but their staff may be located in other countries.

3.5 Employment Businesses

- 3.5.1 ENSEK uses UK based employment businesses to supply UK based temporary staff to support its outsourced business process services.

3.6 Consultants

- 3.6.1 ENSEK uses UK based consultancies to provide supporting consulting services for its business.
- 3.6.2 ENSEK may use EEA / USA based auditors from time to time to audit its controls.

3.7 Misc Other

ENSEK uses a range of other (largely UK based) businesses for various goods and

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services, including: (a) supply, repair, and disposal of laptops and other hardware; (b) office supplies; (c) secure document disposal; and (d) network and internet services.

4. POLICIES

This section provides information about ENSEK's relevant policies.

4.1 Supplier Management Policy and Process

4.1.1 ENSEK has a supplier management policy and process under which it carries out contract, security and privacy due diligence for all of its suppliers.

4.1.2 This does not currently have a process specific to modern slavery.

4.2 Whistleblowing Policy

ENSEK has a whistle-blowing policy, enabling ENSEK staff to raise any concerns confidentially.

4.3 Centrica Our Code

4.3.1 ENSEK is subscribed to an ENSEK configured version of the Centrica "Our Code" statement, that sets out Centrica's minimum expectations for all those the Centrica group works with or alongside, and represents the commitment of the Centrica group to doing the right thing and acting with integrity.

4.3.2 It is communicated to and acknowledged by all ENSEK employees annually.

5. ENSEK'S OWN BUSINESS STEPS

This is statement of the steps ENSEK has taken to ensure that slavery and human trafficking is not taking place within its own business, during the relevant financial year.

5.1 People Team

ENSEK has a dedicated people team (including HR functions) who are responsible for overseeing all job advertising, recruitment and management of employees within the ENSEK business; and who are responsible for overseeing where people work from.

5.2 Recruitment

No recruitment can take place in ENSEK without the approval of the people team, and recruitment is managed through a mixture of reputable UK based recruitment



agencies, and an online job application system.

5.3 Right to Work

- 5.3.1 ENSEK ensures that all its employees are legally entitled to work in the UK,
- 5.3.2 ENSEK undertakes UK right to work checks on all employees prior to their starting work, using a reputable UK service or by a check by ENSEK employees, and will not employ any person who fails the right to work check.
- 5.3.3 Any employment business ENSEK uses for temporary staff, is required to follow the same requirements to verify the identity and right to work of individuals placed with ENSEK.

5.4 Background Screening

- 5.4.1 All new ENSEK employees are subject to background screening under British Standard BS 7858:2019 "Security Screening of Individuals Employed in a Security Environment – Code of Practice standard)", and will not be employed if they fail that screening.
- 5.4.2 ENSEK has an associated background screening policy.

5.5 IT Systems Access

- 5.5.1 ENSEK has a joiner, mover, leaver policy, and process, which means that no individual can be granted access to any ENSEK systems without approvals from at least our people team and business systems team.
- 5.5.2 This enables ENSEK to assure itself that no-one is capable of working for the business without having gone through the correct on-boarding process.

5.6 Performance Reviews

ENSEK carries out regular performance reviews for all staff, and also has regular one-to-one and team meetings at which concerns could be raised.

5.7 Whistleblowing

ENSEK has a internally published whistle blowing policy to enable concerns to be raised confidentially.

6. ENSEK'S SUPPLY CHAIN STEPS

This is statement of the steps ENSEK has taken to ensure that slavery and human trafficking is not taking place within ENSEK's supply chain, during the relevant financial year.



6.1 Reputable Suppliers

ENSEK aims to select from and engage reputable and established suppliers; and some contracts impose obligations to comply with law and/or specifically refer to compliance with the Modern Slavery Act.

6.2 Supplier Due Diligence

6.2.1 ENSEK operates a formal supplier due diligence process under ISO 27001 (2013) so that each new supplier / vendor is subject to due diligence before the contracts are signed.

6.2.2 The supplier due diligence process considers: (a) the contract with the supplier; (b) the information security measures of the supplier; (c) the data protection measures of the supplier.

6.2.3 It often involves communications and meeting with representatives of the supplier.

6.2.4 The due diligence scope does not expressly include modern slavery, but it provides a good insight into the maturity and approach of the supplier's business.

6.3 Slavery / Trafficking Specifics

6.3.1 The due diligence checks include a check for published information from the supplier concerning environment, social and governance matters, and can capture published modern slavery statements.

6.3.2 However, ENSEK do not currently audit the supplier in any detail in this regard, further than their published material.

6.3.3 ENSEK largely relies on the reputation of the supplier, particularly for cloud services, and selects from reputable suppliers.

6.4 Background Screening

For ENSEK' developer suppliers, ENSEK also requires some of their staff to be subject to background screening under local laws, to meet the requirements of the UK Smart Energy Code.

7. RISK SUMMARY

7.1 Key Areas

ENSEK considers that the key areas of our business and supply chain where risk of engaging workers subject to slavery and human trafficking could occur are:

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- 7.1.1 lower skilled temporary workers;
- 7.1.2 office cleaning, maintenance, catering and events;
- 7.1.3 workers used in manufacture of laptops and hardware purchased by ENSEK.

7.2 Overview

ENSEK's products and services are complex and require a high level of skill to provide, and accordingly much of its supplier base similarly needs to supply complex and high skill services, which carry a lower risk of exploitation for slavery and human trafficking purposes.

7.3 Own Staff

- 7.3.1 ENSEK considers there is low risk in relation ENSEK using staff that are subject to slavery or human trafficking.
- 7.3.2 ENSEK is a high skill business, paying industry bench-marked wages, with a robust recruitment and on-boarding process.
- 7.3.3 ENSEK staff need access to ENSEK systems to be able to do any useful work for ENSEK, which will not be granted until completion of the on-boarding process.

7.4 Cloud Services

- 7.4.1 ENSEK considers that there is low risk for most of the cloud services that it uses, as ENSEK uses reputable large suppliers.
- 7.4.2 ENSEK considers there is a low to medium risk for some of the cloud services where the cloud provider has an element of business process outsourcing involving, where ENSEK has not yet fully examined the supplier's sourcing of workers used for those outsourced business processes (e.g. payroll or security monitoring services), but they do involve skilled workers.

7.5 Data Centres

ENSEK considers that there is low risk for most of the UK data centres it uses, as they are run by reputable well-established suppliers, with fixed locations, high security requirements, and high-skilled workforces.

7.6 Developer Services

- 7.6.1 ENSEK considers that there is low-to-medium risk for the developer services that it uses, as ENSEK has not yet fully examined the supplier's sourcing of workers used, but the workers are high-skill and the suppliers of good standing and reputation.



7.6.2 Where possible, ENSEK aims to specify in its contracts the permitted countries of location for those workers.

7.6.3 Also, ENSEK staff work closely with the workers of developer suppliers, as they will be supplying individuals and squads of people who work with ENSEK's product and engineering managers, so this provides a direct visibility of the workers being used.

7.7 Employment Businesses

7.7.1 ENSEK considers that there is low risk for temporary staff provided by employment businesses.

7.7.2 ENSEK uses regulated employment businesses in the UK for skilled temporary staff, and will typically on-board those temporary staff with training and systems access, providing opportunities for identifying slavery and trafficking issues.

7.8 Consultants

ENSEK considers that there is low risk for temporary staff provided by consultancies, as these are high-skilled staff who work directly with ENSEK staff, providing good opportunities for identifying slavery and trafficking issues.

7.9 Misc Other

ENSEK considers that there is a low-to-medium risk (possible, but not likely) for other suppliers it uses for lower-skilled work, such as office cleaning and catering, mitigated by the fact that it has long standing trusted relationships with a number of these suppliers.

8. LOOKING AHEAD

This section sets out information on ENSEK's key improvement plans looking ahead.

8.1 Policy Review

ENSEK intends to review its existing policies to embed in them specific consideration of modern slavery issues.

8.2 Training

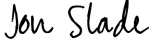
ENSEK intends to put in place modern slavery training for relevant employees.



SIGNATURE

This statement was reviewed and approved by the ENSEK Ltd Board of Directors on 10th June 2025.

For and on behalf of ENSEK Ltd

Signed by:

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Jon Slade

Chief Executive Officer

ENSEK Ltd

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