

## Modern Slavery Statement 2020 PP-SLAV2



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Author: Hilary Scott - 24/05/2021

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## Introduction

Pod Point is publishing this statement under the provision of the Modern Slavery Act 2015. The Act requires Pod Point to state the actions we have taken during the financial year to ensure modern slavery is not taking place in our operations and supply chains. This statement refers to the financial year ending 31 December 2020.

Pod Point supports the elimination of all forms of modern slavery. Modern slavery is a term used in policy and law to describe forms of exploitation that constitute serious violations of human rights, including human trafficking and forced labour. This type of exploitation is contrary to our commitment to respecting the rights of our workforce

As a European supplier of EV charging solutions, Pod Point believes the risk of modern slavery within our business to be relatively low. However, modern slavery can be challenging to identify, particularly when it occurs within complicated supply chains and therefore no business can be considered immune. Pod Point is committed to ensuring that modern slavery, human trafficking, bonded and forced labour have no place in or around our business. Pod Point encourages an honest and open culture and requires all employees to act with integrity at all times.

## About Our Business

Pod Point is a technology company in the electric vehicle charging market. Our mission is that travel shouldn't damage the earth and will be achieved through the building of a smart, easy to use network of charge points which are available everywhere you park.

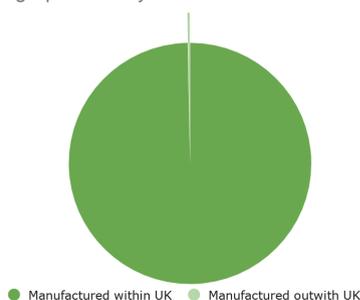
Pod Point’s headquarters are based in Central London where we currently have around 210 full-time employees supporting the installation of our charging solutions both in the UK and Europe. We also indirectly hire, and work with many more people, including contractors. As the business is growing, this number will increase accordingly over the course of the coming year. We currently operate in 2 countries and have less than 400 suppliers. Our procurement spend in 2020 was approximately £28 million.



We use a range of both in-house and outsourced experience to help in the delivery of our solutions to the end customer.

Our supply chain consists of Partners and Suppliers who provide business services to Pod Point.

Manufacturing Split 2020 by Volume



Spend Ratio 2020



## Pod Point Policy

Pod Point understands that people lie at the heart of this legislation. We have a responsibility to respect the human rights of, and an opportunity to make a difference to, our employees, and the people who work throughout our supply chain. Pod Point has a Code of Conduct Policy which addresses the core values of

Pod Point along with the safety of our employees. We are actively working to promote a healthy environment and believe that ethical trading is key to ensuring

that we not only develop our staff but also work with our partners in driving key principles to make certain that we treat everyone with respect and no discrimination.

Acting legally and ethically and following our policies are some of the ways in which we ensure that we always do our best for our Pod Point employees, suppliers and end customers. This value is embedded throughout our business, resonates with our employees and also frames how we expect the suppliers we work with to engage with their colleagues, customers and suppliers. We therefore seek to do business only with suppliers who have similar values and ethics as ourselves. Pod Point does not tolerate slavery, human trafficking, bonded labour, forced labour, child labour or child exploitation. This is explained via our Ethical Trading Policy.

We have implemented a number of policies which allow us to manage human rights within our business and externally with our suppliers.

## Procedures used to assess and manage slavery and human trafficking risk

As Pod Point is a technology company in the electric vehicle charging market, we have to ensure that the risk of modern slavery within our own business is as low as possible. We recognise, however, that through our supply chain, we could be indirectly exposed to the risk of modern slavery and human trafficking.

For our key suppliers we have sought to identify issues or supply chains where workers are more vulnerable to abuses like slavery.

Pod Point has put in place a number of procedures to ensure that modern slavery does not occur in our business or supply chains:

### **1. Supply Chain**

Where third parties are identified as being key suppliers to Pod Point, an assessment is carried out before the supplier is on-boarded. This assessment covers a range of topics including regulatory & legal compliance, code of conduct requirements, child labour & slavery and ethical trading practises. Ad hoc and impromptu site visits are part of the

normal process to ensure compliance. This is an organic process for Pod Point and we are working towards ensuring that every supplier that Pod

Point engages with has shown that they support this initiative and have a robust process in place to meet required expectations.

This will apply to current and future suppliers and is an on-going process. As Pod Point is going through a period of aggressive growth, these checks will be expanded upon to continue to ensure robustness.

## **2. Recruitment and Employment**

Pod Point has comprehensive recruitment processes and procedures in place, including conducting eligibility to work in the UK for all employees to safeguard against human trafficking or forced labour. The majority of our colleagues are full time and all colleagues have Terms and Conditions which are regularly reviewed in line with employment law and best practice. Pod Point only uses reputable employment agencies where absolutely necessary but prefers to do the majority of recruitment in-house.

## **3. Education, Training and Ethical Standard**

In addition to having suitable policies in place, Pod Point understands that a key part of our commitment to the Act is to ensure all our employees understand and comply with high ethical standards and integrity. This will be driven through Pod Point internal Academies where we share and educate our employees through this interactive experience.

## **4. Whistleblowing**

Pod Point has a comprehensive whistleblowing policy which encourages all our employees and stakeholders to speak out if they have concerns about any activity, breach of law, dangers to the public and any concealment of information. Our policy is designed to make it easy for all colleagues to speak up and report anonymously without any risk to their employment or suffering any form of retribution.

## **Risk Assessment**

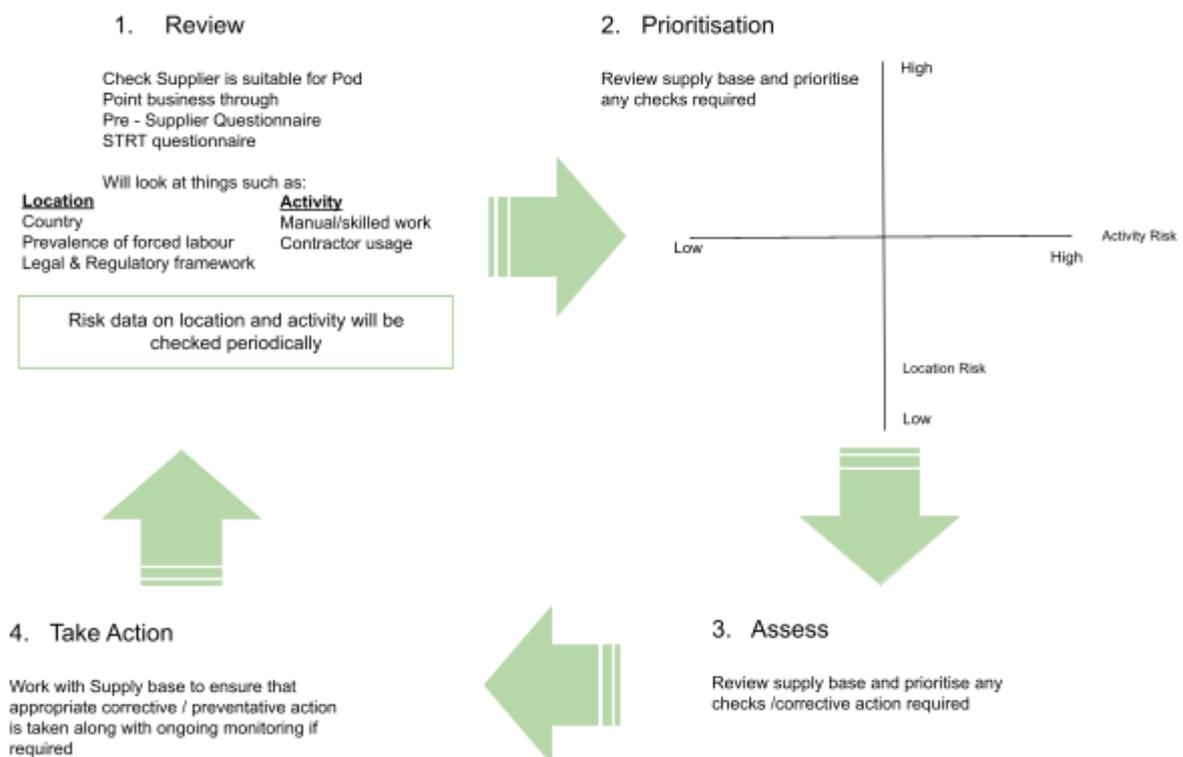
Pod Point is on a journey to ensure that we remove any instances of modern slavery through the utilisation of tender specification requirements to set the correct level of expectation towards our suppliers in establishing how goods and services should be delivered. Tender evaluation processes are also designed to

establish whether suppliers can meet these expectations. As part of this assessment process, we ensure that the suppliers have strong, visible policies in place that covers corporate, social and environmental responsibilities of which modern slavery is one aspect.

We have begun a systematic review of the risk of modern slavery in our businesses and supply chains. We use the Slavery and Trafficking Risk Template (STRT) to identify the country-level risk of factors such as human trafficking, forced labour and the rights of workers, combined with information on the risk associated with our own business activities, especially those involving contracted manual labour such as certain types of manufacturing.

The steps we are taking in this review include a combination of:

- Mapping the contractor chain
- Identifying existing preventative controls and gathering information about workforce demographics and contractor practices, to decide locations, suppliers or contractors for further review.



## Next Steps

As Pod Point is going through a period of rapid growth, we will continue to strengthen our approach to managing the risk of Modern Day Slavery within our

business along with implementing measurable KPI's to ensure that this can be continually monitored and improved upon.

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