

# Modern Slavery Statement 2022



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## 1. 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 is made by and on behalf of Pod Point Limited, its ultimate parent company Pod Point Group Holdings plc, and its subsidiaries which make up Pod Point in the UK (together, in this statement, referred to as Pod Point). Those subsidiaries of Pod Point Group Holdings plc that are required to make their own statement under the Modern Slavery Act 2015, have adopted this statement. This statement refers to the financial year ending 31 December 2022.

Pod Point is a leading supplier of electric vehicle (EV) chargers for both domestic and commercial use in the United Kingdom (UK) and Europe. With manufacturing operations across both UK and Europe and with sourcing, sales and design based out of the UK, we are able to provide products and services to our end customers in an efficient manner.

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. We are pleased to report that for the year ended December 2022, no instances of modern slavery were identified within our business. 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.

In this statement, we set out the processes we have established across the company, together with any steps taken since our last Modern Slavery Statement for the year ended December 2021 to ensure that modern slavery and human trafficking are not occurring within our operations or our supply chain and summarise some of the steps we plan to take during the current year ending December 2023.

## 2. 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 this 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 545 full-time employees supporting the installation of our charging solutions both in the UK and Europe as of 31st December 2022. 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 approximately 660 suppliers. Our spend in 2022 for goods and services was approximately £65 million.

## Core Activities

- Hardware design & development
- Test
- Supplier sourcing & selection
- Software development & application
- Customer technical support

## Specialist Activities

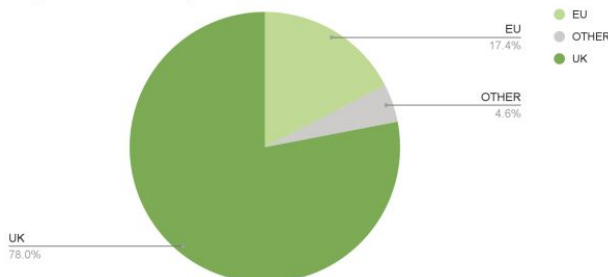
- Survey & site investigation
- Installation
- Commissioning
- Logistics & warehousing
- Network management
- Customer Support

## Support Activities

- Inbound logistics
- Security
- Cleaning services
- Office material and management
- Facilities management

We use a range of both in-house and outsourced experience to help in the delivery and installation of our EV charging solutions to the end customer. Our supply chain consists of Partners and Suppliers who provide business services to Pod Point.

Region Breakdown by Revenue 2022



Supplier Count 2022



## 3. What we have done this year at a glance

It has been a busy year for us in further developing our processes and procedures to ensure that wherever possible we minimise our exposure and risk to any forms of modern slavery. Improvements this year are;

- Updated our supplier assessment/on boarding form to ensure that we have a fuller view of risks.
- Created a risk assessment methodology that we have started to use consistently on suppliers to measure their risk profile.
- Focussed on categorising our suppliers in relation to the part of the business to which they are providing services in order to allow for targeted and proportionate risk assessments.
- Implemented formal supplier onsite audits to examine their levels of compliance as well as production and manufacturing processes and procedures where relevant.
- Finalised our Supplier Code of Conduct to help suppliers navigate the expectations of Pod Point.
- Implemented a new platform to easily communicate any new/changes in the way that we operate for the benefit of all employees.

## 4. 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:

### 4.1 Supply Chain

2022 was a challenging year for Pod Point with the supply chain crisis impacting the sourcing of components that are used within a Pod Point charger. This has had an impact on the number of suppliers being used and there has been a slight increase year over year. In addition, we have introduced our new manufacturing partner based in Europe which is shown by our increasing spend in Europe.

However we have retained a good position of understanding and awareness across our supply base. Pod Point is driving greater disclosure from suppliers to better understand our supply chain risks, including with respect to modern slavery, and to provide the data to manage them appropriately. We have changed the way in which we review our spend and have moved from goods and services to 3 main categories this year to give further focus for the organisation. This has been split into:

- Supply Chain - all suppliers who are used to support the manufacturing of our product.
- Operations - all suppliers who provide support for installation of our product.
- Other - all suppliers who are classed as either a service or support function to Pod Point.

Where any supplier is identified as being a key supplier 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. Over the course of this year we have started to carry out formal audits where suppliers are scored with any non-conformances highlighted. This allows us to check and ensure that they have the correct level of governance in place, is visible to the workforce and thus sets Pod Point's expectations and is part of their working knowledge and understanding.

This is an organic process for Pod Point as we grow and develop, and we are continuing to work towards ensuring that every supplier that Pod Point engages with demonstrates they support this initiative and have a robust process in place to meet required expectations. Our aim is that all of Pod Point's suppliers should provide the same levels of transparency as Pod Point in relation to modern slavery.

For any other supplier that is not identified as a key supplier, they will still go through the risk profile and have a desktop assessment to understand their internal processes for ensuring that modern slavery is not occurring. We have a Supplier Code of Conduct in the final stages of approval which will be disseminated to suppliers, starting with our key suppliers and will be rolled out starting Q1 2023.

## 4.2 Recruitment and Employment

Pod Point has a comprehensive recruitment process and procedures in place, including conducting eligibility to work in the UK assessments 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.

## 4.3 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. Pod Point does have an Ethical Trading Policy (PP-ETP1) and a policy on Corporate Social Responsibility (PP-CSR1).

This will be driven through our online portal to ensure that all employees are aware, have read and understood the policy. Pod Point's Code of Conduct (PP-HR1) underpins everything we do. This applies to all employees of Pod Point and is something that we work hard to ensure is embedded in our everyday processes.

Our Supplier Code of Conduct, when launched in 2023, will form the basis of the ethical and compliance expectations that Pod Point requires of its appointed suppliers. As part of our supplier due diligence and onboarding process, we will ensure suppliers can and will comply with our Supplier Code of Conduct or an equivalent standard.

## 4.4 Whistleblowing

Pod Point has a whistleblowing policy (PP-HR14) 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.

## 5. On-going Impact of Covid-19

Whilst the impact of Covid-19 over 2022 has reduced and moved into a managed phase, Pod Point recognises that Covid-19 is still prevalent and may exacerbate the risk to already vulnerable workers because of a combination of heightened health, safety and economic risks which creates the potential for increased exploitation, human trafficking and modern slavery.

Pod Point has provided clear and strict guidance for all of its own operations to ensure human and labour rights are maintained and government rules are followed at all times. Pod Point is now a "work from home" company and this will remain in place.

We have also ensured that the correct PPE has been made available to our installation workforce and health and safety has remained and remains our number one priority within our operations.

## 6. Risk Assessment

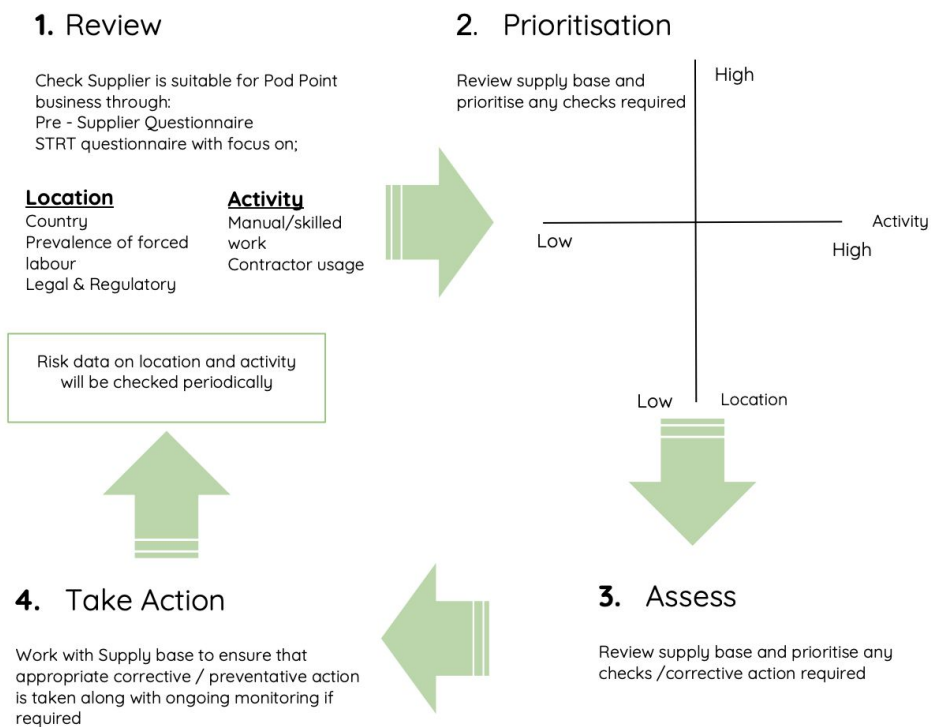
Pod Point is continually improving our procedures and processes to remove opportunity for modern slavery in our supply chain. We utilise our tender process to set the correct level of expectation towards our suppliers in establishing how goods and services should be manufactured and/or delivered. Tender evaluation processes have been changed to reflect 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 are continuing our 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 have taken this year include a combination of:

- Mapping the supplier chain which shows where products or services are located or manufactured. This is now complete.
- Scoring suppliers on our risk profile, reviewing workforce demographics and contractor practices, locations of service or manufacture, policies in place currently, organisation skill set and the management of their supply chain to identify areas of concern. This exercise highlighted 2 suppliers where we need to carry out a more detailed review and either work to improve or off board the supplier. These 2 suppliers are non critical suppliers to Pod Point and constitute an aggregate spend of £2K.

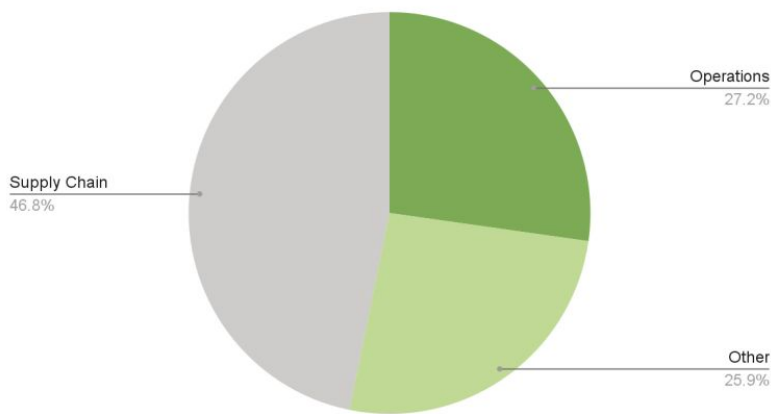




## 7. Next Steps

We have continued our work on all suppliers but changed how we intend to report using a more focussed approach breaking the spend into Supply Chain, Operations and Other. This year has been about maintaining our work on any Supply Chain suppliers but also progressing our review of Operations suppliers.

Revenue Breakdown by Type



The table below outlines the activities being undertaken as we moved through 2022.

Action	Status
Development of modern slavery scoring mechanism to give better transparency in our outcomes and reasoning.	<b>CONTINUE</b> Slavery and Trafficking Risk Template questionnaire is now being used as a standard template with Suppliers and we currently have 48% responses.
Mapping the supplier chain to understand the suppliers currently being used by Pod Point and obtaining all documentation to support the prevention of modern slavery.	<b>CONTINUE</b> At this moment in time we have covered 98% of our Supply Chain annual spend and 59% of Operations spend and 35% of Other spend which constitutes a total coverage of 71% . The focus for 2023 will be to drive this number up into the low 90th percentile.

<p>Categorisation of risk for all suppliers to ensure that the correct focus is given to high risk suppliers.</p>	<p><b>CONTINUE</b> Risk profiling view is complete with 33% covered with all suppliers being looked at in term of location, usage of subcontractors, employee numbers, type of business.</p>
<p>Work with our finance function to ensure correct governance used when adding suppliers to our system and also develop a programme for dis-engaging suppliers.</p>	<p><b>CONTINUE</b> We still remain at the early stages of developing this with our finance function and the wider team at Pod Point.</p>
<p>Development of Supplier Code of Conduct to ensure new suppliers agree to this whilst at the same time work with existing suppliers to get this in place (where we intend to keep them as suppliers of Pod Point).</p>	<p><b>CONTINUE</b> The Supplier Code of Conduct is in final draft due for release early Q1 2023.</p>
<p>Increase transparency with the business and report internally any cases of modern slavery with material concern and the resulting mitigating actions.</p>	<p><b>CONTINUE</b> Risk profiling has identified 2 suppliers which are being worked to ensure we are satisfied that there is minimal risk of modern slavery issues through either corrective or preventative actions. This is an ongoing activity which we plan to develop and further embed within the business as we move forward with our human rights and modern slavery approach. This will continue to be highlighted with the Pod Point whistle blowing policy.</p>
<p>Extend our training programme to continue to grow awareness within the organisation.</p>	<p><b>CONTINUE</b> This will be ongoing improvement where this year saw the introduction of formalised, auditable online activities that the entire company has undertaken to drive awareness of policies within Pod Point.</p>

## 8. Looking Forward

We will continue to strengthen our approach to managing the risk of Modern Slavery within our business along with the ever changing landscape of supply.

The priorities for 2023 are:

- Continue with and complete where possible, any open action from 2022.
- Continue with the Slavery and Trafficking questionnaire to increase to 90th percentile.
- Remove the 2 suppliers that have been identified if, after further assessment and management, remain high risk.
- Creation of a tiering system for suppliers to ensure that we start to prioritise our critical suppliers and where possible consolidate spend.
- Creation of dedicated supplier landing page to help suppliers understand Pod Point's expectations.

This statement is made on behalf of Pod Point Group Holdings plc and its subsidiary Pod Point Limited, in accordance with the Modern Slavery Act 2015, for financial year ended 31 December 2022. It was approved by the Board of Pod Point Group Holdings plc on 24 April 2023.

A handwritten signature in black ink, appearing to read 'Erik Fairbairn'.

Erik Fairbairn  
CEO  
25 April 2023

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