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Modern Slavery Statement 2023

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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 2023.

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 2023, 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 2022 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 2024.
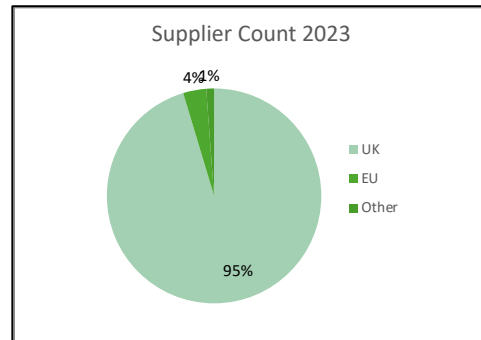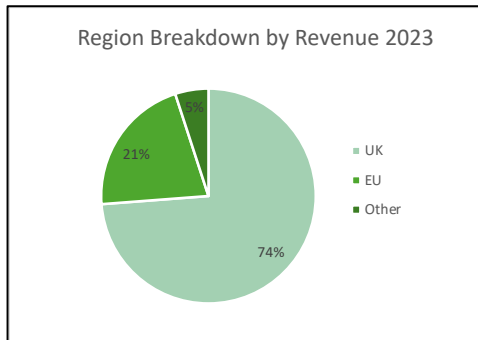
2. About Our Business

Pod Point is a technology company in the electric vehicle charging market. Our purpose is that driving shouldn't cost the earth supporting our vision of making living with an EV easy and affordable for everyone. This will be achieved through the building of a smart, easy to use charger supporting our strategic focus on both home and workplace.

Pod Point's headquarters are based in Central London where we currently have around 591 full-time employees supporting the installation of our charging solutions in the UK as of 31st December 2023. We also indirectly hire, and work with many more people, including contractors. We currently operate in 2 countries and have approximately 341 suppliers. Our spend in 2023 for goods and services was approximately £42 million.

Core Activities	**Specialist Activities**	**Support Activities**
• Hardware design & development • Test • Supplier sourcing & selection • Software development & application • Customer technical support	• Survey & site investigation • Installation • Commissioning • Logistics & warehousing • Network management • Customer Support	• 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. We removed suppliers with an annual spend under £1000 which has taken our number of suppliers to be reviewed down to 258 as they were deemed very low risk.

Region Breakdown by Revenue 2023

- UK 74%
- EU 21%
- Other 5%

Supplier Count 2023

- UK 95%
- EU 4%
- Other 1%

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;

- Rolled out modern slavery training to the supply chain team with a schedule in place to roll out this training to the entire company during 2024.
- Further enhancements to our supplier assessment/on boarding process to ensure that we have a broader view of risks. Improvements made to the Supplier On-Boarding Form will allow us to ensure that stricter due diligence is carried out on new suppliers, reducing the number of suppliers being added to the system at any point in time by having increased oversight.
- Conducted various tenders throughout the year to eliminate rogue spending and consolidate to suppliers who have signed up to the Pod Point Code of Conduct.
- We developed a new Supply of Goods and/or Services Agreement that all new suppliers are required to sign. This includes key elements around modern slavery.
- We updated our PO T&C's to emphasise the importance of modern slavery in our supply chain.
- Finalised the Supplier Code of Conduct, and now in the process of rolling out to the supply base.
- Commenced categorisation of 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.
- Continued rollout of formal supplier onsite audits to examine their levels of compliance as well as production and manufacturing processes and procedures, where relevant.
- Finalising a new supply chain intranet site which is designed specifically for supply chain to communicate to the company, of which modern slavery is a key element.

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

Our greatest area of potential exposure to modern slavery remains consistent and is linked to the procurement and manufacture of electronic components in specific regions. This is recognised at Pod Point, and we are continuously updating our policies and codes of conduct to assist in ensuring that our supply chains are free from slavery and human trafficking.

2023 has been an exciting year in rolling out our new processes across the organisation to further consolidate our suppliers. This has had a positive impact on the number of suppliers being used and there has been a reduction year over year from 660 to 341.

This has been supported by running various tenders throughout the year which has assisted with the consolidation of suppliers and drive spend towards suppliers whom we believe to be low risk.

More suppliers have been audited this year with non-compliances highlighted and we will continue to increase our audits of strategic suppliers at Pod Point through 2024 and beyond. 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.

We have not changed the way in which we review our spend and continue with 3 main categories. 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 and maintenance of our product.
- Other - all suppliers who are classed as either a service or support function to Pod Point.

We did not manage to formalise an external landing page for suppliers but do have plans for an internal page to be created before moving onto the development of an external page.

For 2024, increased due diligence will be used 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 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.

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

Our Supplier Code of Conduct, 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.

We have also engaged with the Supply Chain Sustainability School where the Supply Chain team have completed their modern slavery training and the intention is to roll this out to the wider organisation during 2024.

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) a policy on Corporate Social Responsibility (PP-CSR1) and a Supplier Code of Conduct. We do have automated training of policies. 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.

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. Impact of any Serious Virus

Whilst the impact of Covid-19 has reduced and moved into a managed phase, Pod Point recognises that another virus could occur with similar impacts and as such is fully prepared if such a virus happened again.

Pod Point is set up to allow the workforce to work from home or the office. Pod Point has provided clear and strict guidance for all its own operations to ensure human and labour rights are maintained and government rules are followed at all times.

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. Process flow can be seen below in Table 1.

The steps we have taken this year include a combination of:

- Working on developing the mapping of the supplier chain to show the country/province within the region. This will help further identify hotspots around areas of concern and shows where products or services are located or manufactured.
- 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 0 suppliers, down from 2 the previous year where we needed to carry out a more detailed review. These were non-critical suppliers constituting an aggregate of £2K. These suppliers are no longer used.

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1. Review

Check Supplier is suitable for Pod Point
business through:
Pre - Supplier Questionnaire
STRT questionnaire with focus on;

Location
Country
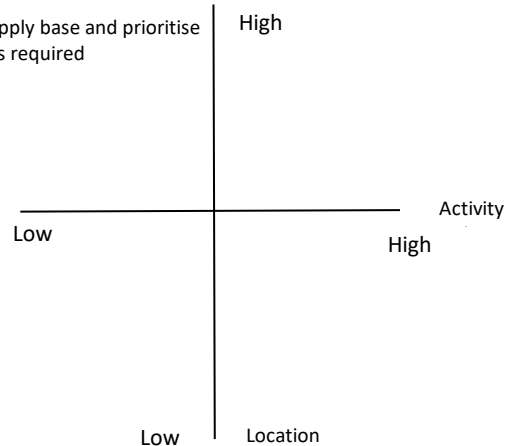Prevalence of forced
labour
Legal & Regulatory

Activity
Manual/skilled work
Contractor usage

2. Prioritisation

Review supply base and prioritise
any checks required

High

Activity

Low

High

Low

Location

Risk data on location and activity will be
checked periodically

4. Take Action

Work with Supply base to ensure that appropriate
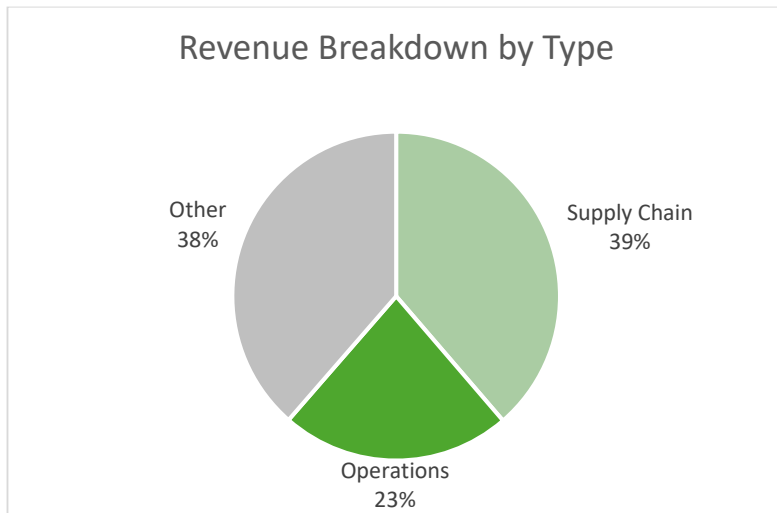corrective / preventative action is taken along with
ongoing monitoring if required

3. Assess

Review supply base and prioritise any
checks /corrective action required

Table 1. Process Flow of On-Boarding a Supplier

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. We have improved our numbers overall and we are at
75% across our entire operations with regards modern slavery of which 87% is complete for
Supply Chain, 63% complete for Operations and 21% complete for Other. There has been an
increase in the changing of suppliers leading to the numbers increasing at a slower rate.

Revenue Breakdown by Type

Other
38%

Supply Chain
39%

Operations
23%

The table below outlines the activities being undertaken as we moved through 2023.

Action	Status
Development of modern slavery scoring mechanism to give better transparency in our outcomes and reasoning.	**CONTINUE** Slavery and Trafficking Risk Template questionnaire is now being used as a standard template with Suppliers and we currently have 75% responses (an increase from 48% last year).
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.	**CONTINUE** At this moment in time we have covered 100% of our Supply Chain annual spend and 96% of Operations spend and 41% of Other spend which constitutes a total coverage of 76% . The focus for 2024 will be to drive this number up into the low 90th percentile.
Categorisation of risk for all suppliers to ensure that the correct focus is given to high risk suppliers.	**CONTINUE** This has increased using the STRT form up to 75% but we are working on developing a specific risk form that will expand how we look at modern slavery.
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.	**COMPLETE** Developed more stringent on boarding process and appropriate oversight and correct levels of due diligence dependent upon classification of supplier.
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).	**COMPLETE** The Supplier Code of Conduct is in final draft due for release early Q1 2023.

Increase transparency with the business and report internally any cases of modern slavery with material concern and the resulting mitigating actions.	**COMPLETE** We have the right level of risk profiling in place. Our intention is to further refine in 2024 when we move to a new system.
Extend our training programme to continue to grow awareness within the organisation.	**CONTINUE** We have online training internally at Pod Point to ensure awareness of all relevant policies but have also enrolled with the Supply Chain sustainability School where further training will be rolled out in 2024.

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 2024 are:

- Continue with and complete where possible, any open action from 2023.
- Continue with the Slavery and Trafficking questionnaire to increase to 90th percentile across the organisation.
- Development of the Supply Chain Sustainability Strategy
- Creation of Supply Chain criteria levelling to prioritise supplier categories.
- Finalise and release an internal page for Supply Chain to highlight modern slavery and what we are doing about it as a team
- Start to work on the external page to help suppliers understand Pod Point's expectations.
- Roll out modern slavery training to everyone at Pod Point

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 our financial year ended 31 December 2023. It was approved by the Board of Pod Point Group Holdings plc on 5 June 2024.

Melanie Lane
CEO
7 June 2024