Modern Slavery Statement 2021

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 2021.

Pod Point is a leading supplier of electric vehicle chargers for both domestic and commercial use in the United Kingdom 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 2021, 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 2020 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 2022.

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 409 full-time employees supporting the installation of our charging solutions both in the UK and Europe as of 31st December 2021. 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 600 suppliers. Our spend in 2021 for goods and services was approximately £60 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.

Region Breakdown by Revenue 2021

EU
4.8%
OTHER
4.3%

UK
90.9%
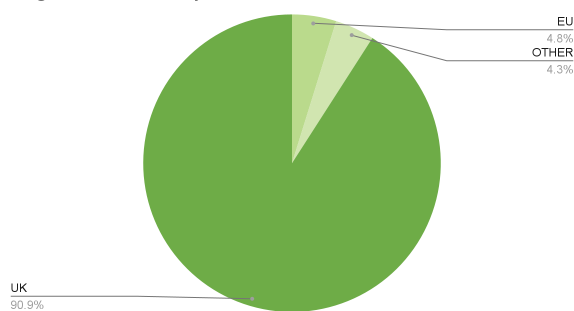
Supplier Count 2021

EU
13.2%
OTHER
0.6%

UK
86.3%
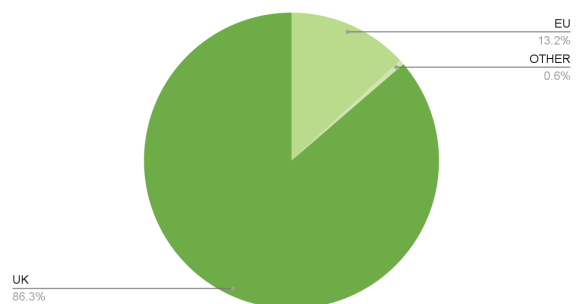
Procedures used to assess and manage slavery and human trafficking risk

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:

Supply Chain

In line with the ever-changing regulatory landscape, organisations are being challenged to operate in a more transparent fashion and are expected to disclose more information than ever before. Pod Point is driving greater disclosure from our suppliers to better understand our supply chain and manage risks related to modern slavery.

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. 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.

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. There has been a slow down on physical checks caused by Covid and we expect this to increase again as we move through 2022.

We are working to ensure that we have a comprehensive Supplier Code of Conduct and anticipate this to be released over the course of 2022.

Recruitment and Employment

Pod Point has a comprehensive recruitment processes 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.

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 Pod Point internal Academies where we share and educate our employees through this interactive experience. In addition, we will be taking a further review on how any internal training is being carried out.

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.

Impact of Covid-19

Pod Point recognises that the Covid-19 pandemic 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 our own operations during the pandemic to ensure human and labour rights are maintained and government rules are followed at all times. During this time Pod Point has introduced a "work from Home" first policy with the office being secondary. This is in place and will remain in place.

We have also ensured that the correct PPE has been made available and is being correctly utilised by our installation workforce; that our workforce have been able to support their families; and health and safety has remained our number one priority at all times within our operations.

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 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 are taking in this review include a combination of:
- Mapping the supplier chain
- Identifying existing preventative controls and gathering information about workforce demographics and contractor practices, to decide locations, suppliers or contractors for further review.

1. Review

Check Supplier is suitable for Pod Point business through
Pre - Supplier Questionnaire
STRT questionnaire

Will look at things such as:

Location
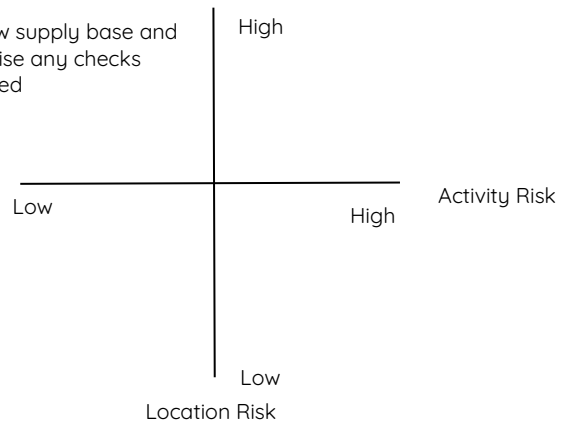Country
Prevalence of forced labour

Activity
Manual/skilled work
Contractor usage

Risk data on location and activity will be checked periodically

2. Prioritisation

Review supply base and prioritise any checks required

High

Low   High   Activity Risk

Low

Location Risk

4. Take Action

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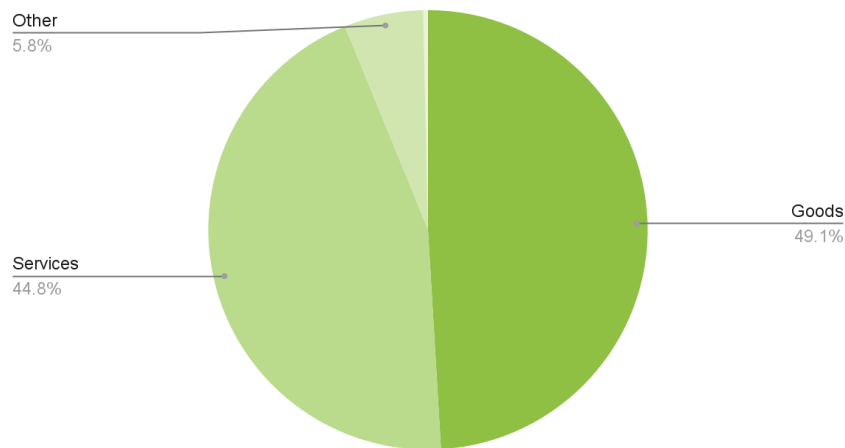
3. Assess

Review supply base and prioritise any checks /corrective action required

Next Steps

2021 was a period of consolidation and information gathering to allow us to understand our suppliers, the focus for 2022 is to filter the supplier type into those that provide Goods and those that provide Services (supporting the company or installation services) to help with the ranking profiles. This year the focus has been on Goods suppliers.

Revenue breakdown by Type

Other 5.8%

Services 44.8%

Goods 49.1%

The table below outlines the activities being undertaken as we moved through 2021.

Action	Status
Incorporate modern-slavery items into our questionnaires and scorecards as an integral part of tender-collateral and sourcing decisions.	COMPLETE We have embedded specific modern slavery questions within our initial questionnaires to get insight on our potential supply chain and include the information-making sourcing decisions. This needs to be extended into our supplier scorecards.
Development of scoring mechanism to give better transparency in our outcomes and reasoning	START This is being developed this year to support the use of the STRT questionnaire and supplier audits
Mapping the supplier chain to the understand the suppliers currently being used by Pod Point, obtaining all documentation to support the prevention of modern slavery and developing the risk profile	CONTINUE At this moment in time we have covered 82% of our Goods annual spend and we will continue with this as we move through this year to ensure that appropriate controls are in place . The focus for 2022 will be Services.
Categorisation of risk for all suppliers to	CONTINUE

ensure that the correct focus is given to high risk suppliers	This is being carried out in line with the mapping out the supplier chain
Work with Finance to ensure correct governance used when adding suppliers to our system and also develop a programme for dis-engaging from suppliers	**CONTINUE** We are at the early stages of developing this with Finance and the wider team at Pod Point
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)	**CONTINUE** The Supplier Code of Conduct is currently in draft form and is being reviewed by the Senior Management Team before formal release
Increase transparency with the business and report internally any cases of modern slavery with material concern and the resulting mitigating actions.	**CONTINUE** No reported cases of material concern. 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
Extend our training programme to continue to grow awareness within the organisation as a whole	**CONTINUE** As we move forward as a company, we are aware of the need to extend the training programme and will be further developed.

Looking Forward

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

The priorities for 2022 are:

- Continue with any open action from 2021.
- Reviewing the Services spend and ensuring all suppliers are taken through the Slavery and Trafficking Risk questionnaire
- Segment the higher-risk suppliers that have been identified via the questionnaire and those that pose the greatest risk will go through further assessments, with the potential that some suppliers will then follow our normal 'off-boarding' process if they fail any of our requirements.
- Review of available e-learning platforms as an additional resource to current Pod Point practises.

Erik Fairbairn
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Pod Point.

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