



Corona Energy

Modern Slavery Act Transparency Statement

Financial Year Ending 31 March 2021

Introduction

This Modern Slavery Act Transparency Statement (“Statement”) has been published in accordance with section 54 of the Modern Slavery Act 2015 (**Act**) enacted in the United Kingdom. It sets out the steps taken by the Corona Energy group companies in the United Kingdom during the financial year ending 31 March 2021 to prevent modern slavery and human trafficking in its business and supply chain. This is the sixth report under the Act.

Corona Energy supports fundamental human rights as set out in the *Universal Declaration of Human Rights* and core *International Labour Organisation Conventions*. In line with the *UN Guiding Principles on Business and Human Rights*, we recognise the duty of states to protect human rights and the responsibility of businesses to respect human rights. We are committed to acting ethically and responsibly in all business relationships and to endeavor to ensure that slavery and human trafficking do not occur in any part of our business or supply chain.

Modern slavery involves the most serious forms of human exploitation and takes many forms, including: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. Corona Energy is committed to identifying and mitigating the risk of modern slavery and human trafficking occurring within its business operations or supply chain.

Corona Energy business and supply chain

The Corona Energy group of companies supplies gas and electricity to over 13,000 commercial, industrial and public sector customers throughout the United Kingdom and supplies 13% of the UK commercial gas market. We have a diverse customer base ranging from small and medium sized businesses to multi-site business enterprises, government entities, educational institutions and large enterprises. Corona Energy currently sources both gas and electricity through the trading arm of its parent company, Macquarie Bank Limited. We employ over 200 people in the United Kingdom.

As a supplier of energy provider the risk of modern slavery within Corona Energy’s direct business operation is considered to be low. However, Corona Energy recognises that it can be indirectly exposed to these risks, for example through its supply chain or customer relationships. Corona Energy takes a risk based approach to modern slavery risk in its supply chain, business operation and customer relationships.

Governance and Policies on Slavery and Human Trafficking

Corona Energy has an established set of policies and procedures that govern the way it operates. These are relevant to how Corona Energy manages potential human rights related issues with regard to its business operations and supply chain. These include:

- Corona Energy's *Code of Conduct*, which incorporates the principles of *What We Stand For: Opportunity, Accountability and Integrity*. These principles guide Board, management and staff conduct. The *Code of Conduct* outlines what is expected of employees in relation to managing risks in all business activities and outlines mechanisms to raise concerns, including through Corona Energy's Whistleblower Program;
- The *Supplier Governance Policy* and associated framework outlines risk triggers and due diligence requirements for Corona Energy when engaging with suppliers in industries which may be considered high risk for human rights breaches. The Supplier Governance framework includes our *Principles for Suppliers* which articulate expectations for suppliers, including that they: respect human rights; provide safe, fair and ethical working conditions; seek opportunities to improve environmental performance; promote supplier diversity; and do not use child labour or any form of forced or involuntary labour under any circumstance. The Principles also provide details on how suppliers are able to confidentially report concerns about improper conduct by Corona Energy or the supplier via emailing: vendor@coronaenergy.co.uk;
- The *Environmental Policy*, which establishes processes for identifying, assessing, managing, mitigating and reporting material environmental risks across the business;
- The *Work Health and Safety Policy* which outlines Corona Energy's commitment to operating harm-free environments through maintaining high work, health and safety standards; and
- The *Whistleblower Policy and Program*, which outlines circumstances under which a person may raise genuine concerns in relation to improper conduct, the avenues for doing so, the protections that are available to those who report improper conduct, and the investigation process. Improper conduct includes any instance or suspicion of modern slavery or human trafficking, breaches of laws and breaches of Corona Energy's internal policies.

Policies and procedures are reviewed at least annually and updated if needed.

Corona Energy staff and external parties, including suppliers, can confidentially report concerns about improper conduct by Corona Energy or by suppliers to the whistleblowing hotline - SeeHearSpeakUp, an impartial and independent reporting platform. The Whistleblower Program is promoted internally including via the *Code of Conduct* and the *Principles for Suppliers*. It incorporates the Whistleblower Policy, and the support and protections available to those who report genuine concerns to ensure that they do not suffer detriment as a result of speaking up. In the year to 31 March 2021, there were no reports of slavery or trafficking through the Whistleblower Program.

Our processes to prevent slavery and human trafficking

Suppliers:

We expect our suppliers to comply with our values and standards set in our company *Code of Conduct* and *Principles for Suppliers*.

Corona Energy's Supplier Governance Policy brings under governance all direct suppliers, which meet high inherent risk and / or high value triggers. The relevant Corona Energy department that procures the goods or services (with support from Corona Energy's Office Manager) owns the supplier relationship and is responsible for assessing all direct supplier relationships to determine whether they meet high inherent risk (which includes Environmental Risk) or high value triggers.

In the year to 31 March 2021, we continued to undertake the following reviews in order to ensure that slavery and human trafficking was not taking place in our business or supply chain:

- We continued to conduct reviews of all parts of our business and found no evidence of either slavery or human trafficking.
- We continued review of our supply chain and confirmed that, based on sector and supply chain profile, the risk of modern slavery continues to be low.
- Suppliers under governance are required to undergo risk assessment and due diligence with internal approvals obtained prior to contract execution, as well as subject to ongoing governance.

We also continue to undertake screening measures in our supplier on-boarding process in accordance with our *Supplier Governance* and *Supplier Life Cycle Policy* to verify that slavery and human trafficking are not utilised by such suppliers and continue to monitor and assess categories of third parties we identify as most at risk in relation to slavery and human trafficking. Corona Energy is committed to maintaining collaborative supplier relationships. In the year to 31 March 2021, this included engaging with key suppliers on the impacts of COVID-19 on their operations and where possible, seeking mutually beneficial outcomes for both parties in response to the pandemic. This involved, but was not limited to, extending contracts and supporting suppliers during lockdowns.

Employees:

Corona Energy is committed to maintaining a safe workplace that values equal opportunity, is free from discrimination, harassment and victimisation. Corona Energy is also committed to maintaining an environment where staff feel comfortable raising issues or concerns and do not experience detriment as a result of speaking up. During the employee onboarding and orientation process, Corona Energy offers a series of learning and development activities (including events hosted by the Chief Executive Officer ("CEO") of Corona Energy's group companies). These are designed to communicate and embed Corona Energy's culture and reinforce the ongoing importance of meeting behavioural expectations and effective risk management across Corona Energy's business.

We have robust policies and procedures in place concerning employment screening (including work eligibility checks), employment conditions and appropriate work place behavior. We also deploy training of our workforce to raise awareness of the issues relating to slavery and human trafficking. All employees are expected to abide by the spirit, as well as the strict requirements, of those policies and procedures outlined in our *Code of Conduct* and to adhere to ethical business practices. These policies and procedures apply across all employment types. These policies and procedures are reviewed on a regular basis and explained to staff through regular training.

All staff are expected to abide by the spirit, as well as the strict requirements, of the *Code of Conduct* and applicable policies and procedures.

Continuous improvement:

Corona Energy will review and enhance its approach to addressing modern slavery risks within its supply chain and its business operation by:

- Embedding in Corona Energy's *Principles for Suppliers*;
- Continuing to assess new suppliers through the on-boarding process and monitor existing suppliers as contracts are renewed;
- Implementing Corona Energy's Financial Crime Risk Governance Policy;
- Continuing to engage with an external consultant to achieve ISO 14001:2015 accreditation; and
- Continuing to train all staff on Corona Energy's *Code of Conduct*.

This statement has been approved by the board of directors of each of the Corona Energy group companies as listed below.

A handwritten signature in black ink, appearing to read 'Neil Mitchell', enclosed in a thin black rectangular border.

Neil Mitchell
Chief Executive Officer

Corona Energy Limited
Corona Energy Retail 1 Limited
Corona Energy Retail 2 Limited
Corona Energy Retail 3 Limited
Corona Energy Retail 4 Limited
Corona Gas Management Limited

November 2021