

## **Modern Slavery Act 2015**

### **Advizzo Limited**

#### **Modern Slavery and Human Trafficking Statement**

##### **Introduction**

Advizzo Limited is a B2B2C business working with electricity, gas and water utilities using billing data and meter data in order to help utilities guide and influence individual customer behaviours .

This statement sets out the approach taken by Advizzo Limited (Reg No 09622961 in England and Wales) towards identifying and preventing modern slavery and human trafficking in its business and supply chains, as required under the Modern Slavery Act 2015 (the "Act").

Advizzo is committed to improving its practices to combat modern slavery and human trafficking.

##### **Our business and structure**

Advizzo is part of the Calisen Group (Holdings) Limited ("Calisen") group of companies. As is common with businesses that operate as a group, a number of back office and support functions are performed at group level, rather than within each individual entity. References to some of the policies, practices and procedures set out below may be conducted on behalf of Advizzo by another group entity.

Advizzo is a software provider offering SaaS solutions to help energy and water utilities drive better customer behaviours and utilises several supply chains to achieve this.

##### **Advizzo's supply chains**

As an expanding business with a number of suppliers, Advizzo recognises that there is a risk (however small) of modern slavery or human trafficking occurring in its supply chains. Advizzo takes a zero-tolerance approach to modern slavery and human trafficking and adheres to the strictest behaviours and standards and expects the same of its suppliers. Advizzo therefore seeks to partner with suppliers that ensure a fair and ethical workplace, where workers are treated with dignity and respect and the highest standards of human rights are upheld.

##### **Advizzo's policies**

Advizzo has a range of policies and procedures in place that are designed to support all employees across a range of issues. Integral to those policies are measures to support the prevention of modern slavery and human trafficking. Advizzo reviews all of its policies on a regular basis to ensure that they are fit for purpose and uploads them to its online document management portal for all employees to access.

As part of the Calisen group of companies, Advizzo has adopted the following new Calisen group policies relating to supplier procurement and management:

- (1) Calisen Procurement Policy
- (2) Calisen Group Code of Conduct for Vendors.

These policies have been reviewed and updated in 2024 and will be reviewed again and updated, where appropriate, in 2025.

As highlighted in the Calisen Group Code of Conduct for Vendors, it is a fundamental requirement of Advizzo to conduct its business with integrity and in accordance with the highest standards of ethics, equity and fair dealing.

Advizzo is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

The Calisen Vendor Management Policy also reflects Advizzo's commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

### **Due diligence processes for modern slavery and human trafficking**

Advizzo operates within the principles (whilst not currently certified itself) of certified management systems, including the quality standard ISO 9001, to help ensure that all relevant aspects of legal compliance and due diligence requirements are identified in respect of human trafficking and modern slavery.

Internally, as part of Advizzo's recruitment and on-boarding process, it ensures that all employees have valid right to work status for the UK and can produce their own documents as requested, whilst also holding agency and contracting workers to this same standard.

Advizzo sources a wide variety of items from a range of suppliers and works to ensure that the items provided are to the highest safety standards and best meet the needs of its business. This includes items such as company IT hardware.

Advizzo utilises group procurement functions and established policies and procedures when onboarding new suppliers.

As part of Advizzo's approach to combat modern slavery and human tracking, due to the nature of the suppliers we use e.g. AWS, we rely upon the modern slavery act statements that such organisations publish. .

### **Vendor adherence to Advizzo's values**

Advizzo believes that it is important for all third parties that it works with to morally align with Advizzo's corporate values, to ensure that such organisations can build long term and mutually beneficial relationships. As part of Advizzo's due diligence process, it ensures that all organisations who are engaged have equivalent Modern Slavery and Human Trafficking statements in place that are easily accessible to other third parties.

### **Training**

Advizzo has implemented an online training program on modern slavery to increase awareness amongst all staff. All new starters will complete this training on joining Advizzo and all existing staff will be required to complete this training every two or three years depending upon their roll within Advizzo.

### **Advizzo's effectiveness in combating modern slavery and human trafficking**

As a service business, Advizzo works with a large number of external organisations and suppliers to deliver the desired service(s) to customers, and so it is accepted that this diverse network brings with it some risks that are continually managed and monitored. Below is a non-exhaustive list of the areas that Advizzo has highlighted as its higher risk areas:

- IT hardware – across Advizzo, a wide range of IT hardware is used to meet the needs of each business area and such hardware is continually being replaced and upgraded. The global IT hardware supply chain has been identified as a growing concern in the context of modern slavery and human trafficking due to the unlicensed supply of the rare earth metals required in the manufacturing process, and the use of specific manufacturing locations chosen for their labour costs in order to drive lower prices. To ensure that the hardware that Advizzo uses is not linked to this type of issue, only reputable suppliers and brands are engaged and Advizzo's supplier due diligence process is also applied to ensure that such suppliers have measures in place to prevent modern slavery and human trafficking in their supply chains;
- visas and work permits – As part of the diverse workforce at Advizzo, there are some employees who require visas to work in the UK. These visas are reviewed before employment commences and then re-verified 6 weeks prior to expiration to ensure that such employees continue to have the correct authorisation to work in the UK. This is managed by the Group's internal Human Resources system on behalf of Advizzo, which generates a workflow reminder to ensure that this process is carried out in time to avoid or limit any disruption to the

employee's contract. If any concerns are raised during initial verification or re-examination due to expiration, such concerns are appropriately escalated and investigated.

### **Further steps**

Advizzo is committed to continual improvement and will take active measures to combat modern slavery and human trafficking in its business and supply chains.

This statement is made under section 54(1) of the Modern Slavery Act 2015 and constitutes Advizzo Limited's Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2024.

This statement has been approved by Advizzo Limited's board of directors and will be reviewed annually.

Approved by the Board: 29 January 2025

Signed by: Sean Latus

Group Chief Executive Officer