

Modern Slavery Act Statement for 2020

This statement is made pursuant to s.54 of the Modern Slavery Act 2015.

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It sets out the steps that Calor Gas Ltd ("Calor") has undertaken, and will continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

As a caring and sustainable business, Calor has a zero tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings. We endeavour to ensure that effective systems and controls are in place to safeguard against any form of modern slavery taking place within the business or our supply chain. Calor's commitment to tackling modern slavery is reinforced in our supplier Code of Conduct.

Our organisation

Calor supplies Liquid Petroleum Gas (LPG) and Liquefied Natural Gas (LNG) to commercial and domestic customers throughout Great Britain. LPG can be supplied either via a portable cylinder or by a bulk tank, stored on the customer's property. LNG is distributed by tanker for use either as transport fuel or for industrial customers. Calor is wholly owned by the Dutch company SHV and only trades within mainland Britain. The LPG and LNG sold by Calor is supplied either by the Dutch company or from refineries in Great Britain.

Calor's financial year runs from January-December.

In-bound supply chain

Calor regularly reviews its Tier 1 suppliers (those most significant in terms of spend) assessing the potential for incidences of modern slavery. On this basis, Calor considers the highest risk areas are suppliers that operate internationally in countries of concern with regards to human rights. To manage this risk, we continue to work closely with our parent company to regularly audit major cylinder and valve suppliers and evaluate the effectiveness of existing controls.

Chartered vessels transporting LPG and LNG were identified as another area of risk. To manage that risk Calor confirmed that all charter agreements include terms of employment for the vessels staff and crew, which conform to the standards outlined in the International Transport Workers Federation.

In 2019, Calor introduced a supplier code of conduct, which outlines the expectations all new suppliers must meet with regards to modern slavery and wider sustainability topics. This was further supported by the phased roll out of a third party sustainability assessment across the supply chain, including the dedicated assessment of human rights and modern slavery.

Our distributors

Distributors play a key role within our supply chain and in order to ensure that these organisations operate in accordance with our expectations and the requirements of the

Modern Slavery Act, we will continue to review certain relationships to scrutinise the supply, sourcing and distribution arrangements. Distributors are subject to contractual arrangements and code of conduct expectations.

Our business

We recognise that the greatest risk of modern slavery is with those not in permanent employment and work closely with service providers to ensure this risk is being managed appropriately. Our relationships with all service providers are reviewed regularly and are subject to normal procurement processes and contracts.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Procurement policy
2. Supplier Code of Conduct
3. Ethical Trading Policy
4. Employee Code of Conduct (which includes whistleblowing and equal opportunities)
5. Environmental Policy
6. Anti-Bribery and Corruption Policy

We may terminate our relationship with suppliers/individuals working with/for us/on our behalf, if they breach these policies.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by use of targets, relating to areas such as:

- Requiring staff to undertake training, where appropriate
- Continuing the roll out of the third party sustainability assessment
- Strengthening of work in areas of greatest risk
- The level of communication and personal contact with next link in the supply chain
- The completion of audits

Responsibility for this policy

The prevention, detection and reporting of modern slavery at Calor or in our supply chain is the responsibility of all of those working for us.

The Calor Management Team has overall responsibility for this policy in ensuring that Company complies with all of its legal and ethical obligations.

Publication of this statement has been delayed due to the Coronavirus pandemic.

Approval for this statement

This statement is approved by the Calor Management Team on.

