
Modern Slavery & Human Trafficking Policy Statement

This Policy is applicable to all ExergInc Group companies; FuturEnergySystems Ltd, SmartCityZen Ltd, Clean Heat Provision Ltd, Serendipity Energy Services Ltd and Seeking Wisdom Foundation.

1. Introduction

ExergInc Group (“the Company”) is committed to preventing all forms of modern slavery throughout its operations and its supply chain. This Policy applies to all Group operations, subsidiaries, associate companies and its interests in Joint Venture (JV) consortia, Special Purpose Vehicles (SPVs) and companies (together “ExergInc”) and all ExergInc employees (“Employees”) and works in conjunction with related ExergInc and HR Policies and Practices. ExergInc expects similar practices to be followed by our Enterprise Partners (suppliers, subcontractors and business partners).

This policy sets out the standards with which ExergInc and employees are expected to comply with regarding modern slavery and compliance with the law. These standards take precedence over local or industry wide ‘custom and practice’. Each Business Unit (BU) Managing Director and or Project Director within ExergInc is required to bring this Policy to the attention of all Employees. The Company, in compliance with the Modern Slavery Act 2015 (“the Act”), will provide a prominent link to the ExergInc annual statement on modern slavery on the homepage of its website.

2. Definitions

2.1 Modern Slavery: The term ‘modern slavery’ is used to denote situations where one person deprives another person of their liberty in order to exploit them for personal or commercial gain.

2.2 Human Trafficking: The term human trafficking is the act of recruiting, transporting, transferring, harbouring or receiving a person, through any coercive means (such as threat, use of force, deception or abuse) for the purpose of exploitation. Where the victim is under 18 years of age, there is no requirement of coercive means.

2.3 Forced Labour: The term forced labour is where people are forced to do any work or provide services against their will under the threat of some form of punishment. Almost all slavery practices, including trafficking in people and bonded labour, contain some element of forced labour.

3. Policy Compliance with the Law

ExergInc and all Employees are required to comply fully and to behave in accordance with the Act. The consequences of infringing the Act are extremely serious both for the Company and for individual employees and may include the imposition of significant financial penalties.

Ignorance of the law is neither an acceptable excuse nor a defence to non-compliance, and the Act makes it clear that the consent of the victim is not an automatic defence. All migrant workers will be treated in accordance with UK legislation and existing ExergInc HR policies and practices and will be subject to the same employment contract terms as other potential recruits. ExergInc requires that the following practices are complied with.

Forced or Involuntary Labour: Employees shall not be subject to any form of forced, compulsory, bonded, indentured or prison labour. All work must be voluntary, and Employees shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length as required by their employment contract.

Recruitment Fees: Employees shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.

Document Retention: Confiscating or withholding identity documents or other valuable items, including work permits and travel documentation (such as passports) is strictly prohibited. All documentation retention shall be in line with Data Protection and Document Retention guidelines.

Contracts of Employment: All Employees will be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.

Deposits: No Employees will be required to lodge deposits or security payments at any time.

Humane Treatment: The workplace shall be free of any form of harsh or inhumane treatment (such as harassment, mental or physical coercion, or verbal abuse of employees; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour) for all Employees and potential employees.

Workplace Equality: All employees, irrespective of their nationality or legal status, shall be treated fairly and equally.

Wages and Benefits: All Employees shall be paid at least the minimum wage required by applicable laws and shall be provided with all legally mandated benefits. Wage payments shall be made at regular intervals and directly to all Employees, in accordance with national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorised by national law or as set out in general ExergInc policies are permitted (such as season ticket loans) and, if made or provided, actions shall only be taken with the full consent and understanding of Employees. Clear and transparent information shall be provided to Employees about hours worked, rates of pay, and the calculation of legal deductions.

Working Hours: Employees shall not be forced to work more than the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week and should comply with flexible working time policies and or normal ExergInc contractual hours and total working hours including overtime shall not exceed sixty. All overtime shall be purely voluntary unless part of a legally recognised collective bargaining agreement. Payment for overtime will be in accordance with ExergInc additional hours worked guidelines and policies.

Freedom of Movement and Personal Freedom: Employees' freedom of movement shall not be unreasonably restricted. Mandatory residence in employer-operated facilities shall not be made a condition of employment.

Private Employment Agencies and Labour Recruiters: Employees should be hired directly whenever possible. When the subcontracting of recruitment and hiring is necessary ExergInc shall ensure that the labour agencies it engages operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places Employees at risk of forced labour or trafficking for labour exploitation.

4. Grievance Procedures

ExergInc has in place grievance procedures to ensure that any Employee, acting individually or with other Employees, can submit a grievance without suffering any prejudice or retaliation of any kind.


5. Disciplinary Procedures

Any breach of this policy by an Employee which is upheld upon investigation should be dealt with in conjunction with the relevant ExergInc disciplinary policy.

6. Reporting, Referral & Questions

Each BU Managing Director and or Project Director is required to report immediately to the ExergInc General Counsel any breach, or any reasonable suspicion of such breach, of this policy. Employees who have any concerns over matters relating to this policy should raise them with their Line Manager. Where they are unwilling or unable to do so, or where they are dissatisfied with the outcome of having done so, Employees should either approach the HR Director, COO and or the Group Managing Director of the Company directly. The Company promises a timely and fully transparent investigation and follow-up to any concerns raised this way.

This Policy Statement will be reviewed annually or sooner subject to change in UK legislation and or lessons learned identified within ExergInc during its business activities.



David Smith
Group Executive Chairman
ExergInc Group

Date: 1st May 2024