

Modern Slavery Act 2015 (MSA)

Octopus Group Holdings Ltd is a private limited company, incorporated in England and Wales with registered number 14002583. The Registered Office is at 6th Floor, 33 Holborn, London EC1N 2HT (Octopus, We or Us). Octopus Investments Limited, a subsidiary company (also incorporated in England and Wales with registered number 3942880), is regulated by the Financial Conduct Authority.

Services and supply

The services Octopus utilises itself are office based and its supply chain in relation to services consists, on the whole, of other regulated professional services (Chartered Surveyors, Law Firms, Accountancy Firms and Banks). Octopus considers these to be very low risk in relation to slavery and human trafficking so takes no specific action in respect to these relationships.

Octopus provides a range of services within the structure of investment and fund management. Investment is made directly into energy generation and supply, healthcare, schools and renewable energy. Octopus Investments invests, on behalf of its customers, in a range of different businesses and industries through its Ventures team which has five areas of focus: FinTech, Health, Consumer, B2B Software and deep tech and invests in a range of tech-enabled businesses within these sectors. Octopus also invests in Real Estate and, through the Sustainable Infrastructure Team, into fibre businesses, an operating landfill gas and biomass business, a retirement village operator and housebuilder. The Smaller Companies Team invest in AIM-listed companies.

Octopus sends out an annual Engagement Tool to the portfolio companies that it invests in which questions how a company considers its stakeholders (employees, community, customers, environment) and how it is governed. One of the questions ensures that our portfolio companies pay the Living Wage to their employees and interns, and that employees have formal contracts in place. If our companies do not do this, then we engage with them to ensure that they do.

The majority of other services supplied to or on behalf of Octopus are from the construction industry and other services associated with property (domestic, commercial, rural and forestry). Given what Octopus understands to be a low risk profile of anyone supplying us with services being involved in slavery and/or human trafficking, we believe our current procedures, as described below, and ability to rely on regulatory oversight in relation to professional services are sufficient in this regard.

Every supplier that Octopus enters into an engagement with must be onboarded onto a 3rd party platform. The supplier creates a profile and answers a list of

questions relating to social, environmental and governance factors. This includes questions on recorded incidences of modern slavery in the past 12 months, and if they ensure compliance with human rights laws and regulations, ethical labour practices and the prevention of modern slavery. If the suppliers answer 'yes' to any of these questions, then they must follow up with evidence and answer further questions.

Goods

In terms of goods supplied to Octopus, the majority of goods will be goods for use in an office environment. Given what Octopus understands to be a low risk profile of suppliers of goods, no specific training is provided or undertaken by Octopus staff in relation to these matters.

Training of staff

Octopus provides employees and management with training on a range of compliance matters which, where relevant to their role, would include their obligations under the Modern Slavery Act 2015, particularly in relation to mitigating risks within supply chains.

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes the Octopus Group slavery and human trafficking statement.

This statement was approved by the Board of Directors of Octopus Group Holdings Ltd on 06 September 2024.

Simon Rogerson
CEO
06 September 2024