

Modern Slavery Statement

Switchd Ltd t/a MakeMyHouseGreen

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Introduction

This statement is published by Switchd Ltd (trading as MakeMyHouseGreen) in the spirit of the Modern Slavery Act 2015. Although Switchd Ltd's annual turnover is below the £36 million threshold that triggers a mandatory obligation under Section 54 of the Act, we are committed to operating our business ethically and transparently, and to ensuring that modern slavery and human trafficking have no place in our operations or supply chains.

Modern slavery is an umbrella term covering slavery, servitude, forced and compulsory labour, and human trafficking. We recognise that these abuses can occur in supply chains globally, including in sectors relevant to our business such as the manufacture of solar panels, inverters and batteries, and in the labour markets from which we draw our installer network.

1. Our Organisation, Business and Supply Chains

Switchd Ltd is a private limited company incorporated in England and Wales (Companies House No. 10408051), trading as MakeMyHouseGreen. We are a technology-led business headquartered in London that enables UK homeowners to access solar photovoltaic systems, battery storage, EV charge points and associated renewable energy technologies through a data-driven online platform.

Our supply chain has two principal components:

Equipment supply chain We source solar panels, inverters and battery storage systems through established UK renewable energy wholesalers, including UK Greentech, Midsummer Wholesale and Segen. These wholesalers in turn source equipment from manufacturers including Enphase, Tesla, Aiko Solar, JA Solar, Sigenergy, Fox ESS and Duracell Energy. The manufacture of solar panels, inverters and batteries involves global supply chains, including the extraction and processing of raw materials, which we recognise carries inherent modern slavery risk — particularly in relation to forced labour in certain regions of China, including concerns that have been raised publicly about the Xinjiang region.

Installer network Physical installations are carried out by a network of vetted third-party installation companies and, in some cases, our own directly employed installation teams. These individuals work in customers' homes across the UK. We are the primary contractual party responsible to customers for all installations carried out under our name.

2. Our Policies in Relation to Modern Slavery and Human Trafficking

Switchd Ltd operates a zero-tolerance approach to modern slavery and human trafficking in all its forms. This commitment is embedded in our contractual and operational frameworks:

Partner and subcontractor agreements Our standard partner agreement requires that all partners and subcontractors comply with all applicable labour, employment, anti-slavery and human trafficking laws, including the Modern Slavery Act 2015. Partners must not engage in any activity, practice or conduct that would constitute an offence under sections 1, 2 or 4 of the Modern Slavery Act 2015. These obligations are required to be cascaded down through subcontractors' own supply chains.

Installer agreements All installation companies working under the MakeMyHouseGreen name sign an installer agreement before being allocated any work. This agreement sets out required quality standards, responsibilities and ethical labour obligations. Installers are required to demonstrate right-to-work compliance for all individuals engaged on our projects, and to maintain appropriate employment practices.

Equipment sourcing We expect all equipment wholesalers and manufacturers we work with to comply with the Modern Slavery Act 2015 and equivalent international standards, and to operate policies and controls consistent with the spirit of the Act. We do not knowingly procure products from suppliers where there is evidence of serious or unmanaged modern slavery risk.

3. Due Diligence Processes

Equipment manufacturers We operate an internal due diligence process for each manufacturer whose equipment we install. This includes a structured checklist covering:

- Confirmation that the manufacturer is supplied through established UK wholesalers who operate their own compliance and due diligence processes
- Review of available information and declarations to ensure there is no clear evidence that products are sourced from, or linked to, regions associated with high modern slavery risk, including the Xinjiang region

- Assessment of how far the manufacturer can trace its supply chain (to cell, wafer or polysilicon level where possible) and whether it has programmes in place to improve transparency over time
- Review of the manufacturer's modern slavery or human rights statement, where available, including how they identify, assess and address risks in their supply chain
- Review of how the manufacturer has responded to any public reporting, NGO campaigns or media coverage regarding labour standards or human rights concerns
- Assessment of SSI membership or equivalent industry sustainability initiative participation
- Review of policies and contractual requirements imposed by the manufacturer on its own supply chain

All active manufacturers we work with are assessed against this checklist. If new information emerges — such as credible reports of forced labour, serious governance failures or significant quality issues — we conduct an immediate review and may suspend or cease purchasing from that supplier. Final approval decisions are made jointly by our Operations Manager and a Director.

Wholesalers Our wholesalers are subject to relevant UK law including the Modern Slavery Act 2015 and the Bribery Act 2010, and maintain their own due diligence procedures, anti-slavery and anti-bribery policies in order to import and distribute equipment in the UK. We review available policy documentation and conduct reputation checks when onboarding new wholesalers.

Installers All installation companies go through a structured pre-engagement vetting process before being allocated work. This includes:

- Companies House checks for external companies, covering active status and relevant bans or disqualifications
- Right-to-work and identity checks for all individuals working on our projects
- DBS checks where appropriate
- Review of health and safety documentation and insurance
- A structured interview covering experience, technical competence, approach to safety and customer communication
- Reference checks with previous customers
- An observed installation before a company is admitted to our regular network

All installers sign our installer agreement prior to commencement of work, which includes explicit ethical labour obligations. We re-vet installers on an annual basis as standard, and immediately where any performance, safety or conduct concern arises.

4. Risk Assessment

We have identified the following areas as carrying the greatest risk of modern slavery in our business and supply chains:

Solar panel and battery manufacturing The manufacture of solar PV components involves raw materials and processing steps that have been associated with human rights concerns in certain geographic regions. The solar panel supply chain — particularly the production of polysilicon — has attracted scrutiny in relation to alleged forced labour practices in the Xinjiang region of China. We address this risk through our manufacturer due diligence process, including explicit checks for Xinjiang sourcing, supply chain traceability and public response to scrutiny. We work only with wholesalers and manufacturers that can demonstrate engagement with responsible sourcing standards.

Installer labour Domestic installation work carries a general risk of labour exploitation, particularly where subcontracting chains are long or where workers may be vulnerable. We mitigate this risk through our structured installer vetting process, direct contractual relationships with installation companies, right-to-work checks, and our post-installation customer call on every job, which provides an additional visibility mechanism on site conduct.

Low risk areas Our office-based operations in London carry a low risk of modern slavery given the nature of the work, the employment profile and our London location. Our directly employed team members are employed on standard UK employment contracts with appropriate pay, benefits and working conditions.

5. Effectiveness

We measure our effectiveness in addressing modern slavery risk through the following indicators:

- 100% of active equipment manufacturers have been assessed against our internal modern slavery due diligence checklist
- 100% of installer companies in our network have signed our installer agreement, which includes explicit modern slavery and ethical labour obligations
- 100% of installation companies undergo right-to-work verification for all individuals before commencing work on our projects
- No credible reports of modern slavery or forced labour have been identified in our supply chain to date
- Annual re-vetting of installers ensures ongoing compliance monitoring
- We have not identified any instance where a wholesaler or manufacturer has failed to meet our minimum requirements on modern slavery risk management

We will continue to develop our measurement framework as our business scales, including working towards full quantified supply chain traceability data from equipment manufacturers.

6. Training and Awareness

All members of the Switchd Ltd team are made aware of the risks of modern slavery and human trafficking relevant to our business, including:

- The risk of forced labour in solar panel supply chains, particularly at the polysilicon production stage
- The indicators of labour exploitation in the domestic installation sector
- How to raise concerns about suspected modern slavery through our internal reporting channels

We are committed to ensuring that as our team grows, all new employees receive appropriate awareness training on modern slavery as part of their induction. We will develop a formal modern slavery training programme for all staff by the end of 2026.

7. Continuous Improvement

We recognise that our modern slavery due diligence processes, while robust for an organisation of our size, will need to develop as our business grows. Our commitments for the next 12 months include:

- Engaging directly with our key equipment manufacturers to obtain and review their most recent modern slavery statements and supply chain traceability data
- Exploring membership of or alignment with relevant industry initiatives such as the Solar Stewardship Initiative (SSI)
- Completing the Modern Slavery Assessment Tool (MSAT) developed by the Home Office and sharing the output with key public sector partners
- Developing a formal modern slavery training programme for all staff

Declaration

This statement represents a true and accurate account of Switchd Ltd's approach to identifying and addressing the risk of modern slavery and human trafficking in our operations and supply chains.

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