



TPI Code of Conduct

Applicable to parties of:

SmartestEnergy Limited (Reg. 3994598)

v1 | April 2023



1. Introduction

At SmartestEnergy Limited ('Smartest/SEL/the Company/We'), our approach to compliance and ethics are of paramount importance to us and we expect the same from every party we conduct business with. Our core values of "Own It", "One Team – One Future", "Innovate to Accelerate" and "Think Customer" are the drivers behind our decision making and how we shape our business, both internally and externally.

Transparency, openness, and proactive compliance are at the heart of all our decisions and this document will highlight the minimum standards expected from our Third-Party Intermediaries/TPIs/Brokers/Managing Agents/Partners/Consultants (hereafter referred to as 'TPIs').

SmartestEnergy Limited ('SEL') are the parent company to SmartestEnergy Business Limited ('SEBL' – formerly Dual Energy Direct Limited). This document relates to SEL only. If you wish for more information around codes of conduct relating to SEBL please contact compliance@smartestenergy.com.

2. Expectations

We expect all TPIs who we contract with to take personal responsibility for adhering to this Code of Conduct and to:

- Act with honesty, integrity and in good faith at all times.
- Treat our customers and staff with courtesy and respect, and to remain professional at all times.
- Act in the best interests of the customer in a transparent manner, in line with industry regulations.
- Not implement any high-pressure tactics, force or coercion with any SEL staff or customers.
- Ensure that customers are made aware of the full details of their electricity/gas contract, including unit rates, commission amounts and contract end dates.
- Adhere to all requirements and terms of any contracts/agreements made with SEL.
- Ensure that their staff are adequately trained to undertake their duties (including where relevant/required additional training relating to GDPR, Modern Slavery, Competition Law, Cyber Security, Fraud and Anti-Bribery).
- Notify SEL immediately of any conflict of interest between themselves, their customers, or SEL, and if they have any concerns around any gifts or hospitality offered to or received by SEL.
- Make SEL aware immediately of any confidentiality or data breach incidents (either actual or suspected).
- Sign-up to the Micro Business Alternative Dispute Resolution (ADR) scheme, and to make customers aware of said scheme, if they are facilitating Micro Business contracts.
- Act in line with all contractual and applicable industry requirements.

3. Breaches and Questions

Any breaches of this Code of Conduct must be reported to compliance@smartestenergy.com immediately. Any confirmed breaches may lead to investigations and requests for information, in line with any relevant contractual terms and internal controls.

If you have any concerns or queries relating to the above, please contact our Compliance and Regulation department via: compliance@smartestenergy.com.

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Ryuichi Noyama	COO, SmartestEnergy Limited
James Graham	VP Sales, SmartestEnergy Limited