

ETHICAL POWER GROUP POLICY ANTI-SLAVERY POLICY

Signed



CEO

Dated

12/04/2021.

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Introduction

This statement sets out Ethical Power Group Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and throughout its supply chains.

As part of processes for managing our workforce and supply chain, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Ethical Power Group Ltd is absolutely committed to preventing slavery and human trafficking throughout all its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

Ethical Power Group Ltd delivers high quality, sustainable and innovative energy solutions to encourage and shape a brighter future. The company's vision is to continue raising standards and pioneer the efficient development, construction and maintenance of renewable energy generation technology which when coupled with our holistic approach, allows us to bring our values to every element of the company.

- **Policies:** Ethical Power has a broad library of policies that cover all working aspects of Ethical Power Group Ltd. These policies have been produced by the Ethical Power Management Team and are all approved by and overseen by our Managing Director.
- **Risk assessments:** All aspects of work conducted by Ethical Power Group Ltd are covered by Risk Assessments that are specific to Ethical Power. All risk Assessments have been reviewed and approved by the Ethical Power Group SHEQ Manager.
- **Investigations/due diligence:** All the separate departments of Ethical Power Group Ltd are responsible for monitoring and if required investigating anything that could be considered as or related to modern day slavery. These investigations will be managed by the SHEQ and HR Managers and overseen by the Ethical Power Board.
- **Training:** Ethical Power Group delivers regular training to all staff. As part of this training staff are given presentations on equal opportunities, discrimination and bullying within the workplace. As part of these presentations staff are given an understanding of what constitutes modern day slavery and how to recognise it.

Relevant policies

We operate the following policy that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations [select the relevant policies from the list below and include links to the full text]:

- EP-POL-031 Whistleblowing policy.** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can [use our confidential helpline/complete our confidential disclosure form].
- EP-POL-007 Dignity at Work Policy.** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- Supplier/Contractor Code of Conduct** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship. All our suppliers and contractors are required to complete a Pre-Qualifying process. This process enables Ethical Power Group Ltd to review their policies insurances and other relevant documentation relevant to our working relationships.
- The Human Resources Manager** oversees that Ethical Power Group Ltd use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

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Version 1.1	It is the responsibility of the user to ensure they are reading the latest version of the document	Doc Ref_EP_POLICY_048

Due diligence

We undertake due diligence when considering taking on new suppliers/contractors, and regularly reviews our existing suppliers/contractors. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier [this may be part of a more general human rights or labour rights assessment];
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier/contractor audits or assessments through Ethical Power Group Ltd SHEQ Manager or other third party auditors, which look for slavery and human trafficking where general risks are identified;
- continually reviewing all our suppliers/contractors;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers/contractors and requiring them to implement action plans;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier/contractor code of conduct, including the termination of the business relationship.

Training

We require within our organisation to complete training on modern slavery [as a module within our wider equal opportunities, discrimination and bullying training programme.

We require all staff to attend one of a number of training sessions that are being run our HR Manager.

Our modern slavery training covers;

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within Ethical Power;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.