

ETHICAL POWER GROUP

MODERN SLAVERY POLICY

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CEO

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Glossary of Terms:

Term / Acronym:	Definition / Meaning
Ethical Power (EP)	Includes Ethical Power Group Limited, Ethical Power Ltd, Ethical Power Connections Ltd., Ethical Power Development Limited, Ethical Power Utilities Limited and other associated companies under the Ethical Power Group of companies (the Company)

1. Introduction

Ethical Power are committed to preventing modern slavery and human trafficking occurring within our organisation and to reducing the risk of occurrence in our supply chain. This policy sets out measures we will take towards this and our expectations of our staff and third parties with whom we work.

The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

This policy covers all four activities.

2. Purpose

The purpose of this policy is to set out Ethical Power'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 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.

3. 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. These policies have been produced by the Ethical Power Management Team and are all approved by and overseen by our Group Managing Director.

- Risk assessments: All aspects of work conducted by Ethical Power are covered by Risk Assessments that are specific to Ethical Power. All risk Assessments have been reviewed and approved by the Ethical Power SHEQ Manager.
- Investigations/due diligence: All the separate departments of Ethical Power 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 Manager and overseen by the Ethical Power Board.
- Training: Ethical Power 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.

4. How is it relevant to us?

Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not. At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense. More importantly, it is simply the right thing to do.

The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

With this in mind, we need to pay particularly close attention to:

- a) our supply chain
- b) any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
- c) cleaning and catering suppliers
- d) corporate hospitality.

5. Responsibilities

Ethical Power, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity. Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

6. Organisation responsibilities

The CEO has overall responsibility for this policy.

We will:

- a) regularly assess the risk of modern slavery occurring within our organisation and supply chain and commit to taking further steps to reduce those risks;
- b) maintain clear policies and procedures preventing exploitation and human trafficking, and protect our workforce and reputation and communicate those internally and to our suppliers;
- c) monitor our supply chains (see paragraph 8.2);
- d) be clear about our recruitment policy and lead by example by making appropriate checks on employees, recruitment agencies, consultants, suppliers and other relevant

- contractors to ensure we know who is working for us and by ensuring all those working for us are aware of this policy;
- e) ensure we have in place an open and transparent grievance process for all staff and there are no barriers to reporting modern slavery concerns or breaches of our policies;
 - f) seek to raise awareness so that our colleagues know what we are doing to promote their welfare;
 - g) make a clear statement to demonstrate that we take our responsibilities to our employees and our clients seriously (see paragraph 8.1);
 - h) ensure we meet applicable legal obligations; and
 - i) evaluate our strategy and measure its effectiveness including the development of our organisational values and ethical behaviours.

6.1 Manager responsibilities

Managers will:

- a) listen and be approachable to colleagues;
- b) respond appropriately if they are told something that might indicate a colleague or any other person is in an exploitative situation;
- c) remain alert to indicators of slavery (see Identifying slavery);
- d) raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do; and
- e) use their experience and professional judgement to gauge situations.

6.2 Colleagues

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- a) keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- c) tell us if you think there is more we can do to prevent people from being exploited

7 The risks

The principal areas of risk we face, related to slavery and human trafficking, include:

- a) supply chains
- b) recruitment through agencies
- c) general recruitment

We manage these risk areas through our procedures set out in this policy and elsewhere.

8 Our procedures

8.1 Anti-slavery statement

We make a clear statement to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously. We make this statement through this policy and on our website.

8.2 Supply chains

We check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.

We tell the companies we do business with that we are not prepared to accept any form of exploitation.

All our supplier contracts contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

9 Recruitment

We are committed to ensuring that we and any external recruitment agencies we use have clear and fair recruitment policies and procedures and that on one has to pay directly or indirectly any fees to work for us.

9.1 Using agencies

Our HR department and managers with responsibility for hiring within Ethical Power follow Ethical Power policy on using only reputable recruitment agencies that comply with regulations and legal obligations and with whom we have written agreements in place.

To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before agreeing use their service. This includes:

- conducting background checks
- investigating reputation
- ensuring the staff an agency provides the appropriate paperwork (e.g. right to work checks i.e. relevant visas)
- ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying.

10 General recruitment

We ensure that prior to starting work, all employees are provided with a written contract of employment.

We always ensure employees are legally entitled to work in the UK.

We must check the names and addresses of our employees (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

We provide information to all new employees on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

All new employees go through an onboarding process to ensure they are aware of our values, policies and procedures, where to find out about any updated and where to find help within the business.

If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures (See Reporting slavery).

11 Identifying slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- the person is not in possession of their own passport, identification, or travel documents.
- the person is acting as though they are being instructed or coached by someone else.
- they allow others to speak for them when spoken to directly.
- they are dropped off at and collected from work.
- the person is withdrawn, or they appear frightened.
- the person does not seem to be able to contact friends or family freely.
- the person has limited social interaction or contact with people outside their immediate environment.
- This list is not exhaustive.

Important: a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right; so if you have a suspicion, report it!

12 Reporting slavery

We encourage anyone affected by modern slavery or human trafficking, or anyone with concerns that someone within our organisation, supply chain or business associates is affected by modern slavery and human trafficking to speak up. If you raise a concern under this policy in good faith, we will support you, even if you turn out to be mistaken.

Talking to someone about your concerns may stop someone else from being exploited or abused.

If you think that someone is in immediate danger, dial 999. Otherwise, you should discuss your concerns with your Senior Manager who will advise or seek further advice from the HR Manager.

Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns your Senior Manager first.

13 Training

Employees have been introduced to a new online module system since January 2023. One of the mandatory modules is Business Essentials covering the following topics:

- Modern Slavery
- Whistleblowing
- Anti-Bribery
- Anti Money-Laundering, and
- Environmental Awareness

Training is provided through a Group Learning Management System. Each employee is required to complete mandatory training which includes awareness and confirming knowledge in the list. Newsletters and an Intranet are additional methods of communication to increase awareness.

14 Monitoring and review

This policy will be monitored regularly, at least annually, and at additional intervals as may be required regarding:

- our existing and emerging legal obligations;
- emerging modern slavery trends, risks and developments relevant to our organisation including the impact of any changes on our organisation or our approach;
- our Anti-slavery policy and statement, along with any associated policies, processes and procedures such as [e.g. our procurement policy, recruitment policy, risk assessments, supply chain terms and conditions (including any breaches), tender documentation, supplier audit results];
- feedback from stakeholder engagement, our audit process and our colleagues;
- the effectiveness of our processes and procedures;
- any recommended changes in our approach;
- any suspected or identified cases of modern slavery; and
- whether or not it is appropriate to consult internally or externally regarding modern slavery risk.

The CEO will approve any changes to our strategy, policy and procedures, and we will provide information and/or training on any changes we make both internally and through our supply chain, using appropriate methods and channels of communication.