

ETHICAL POWER GROUP MODERN SLAVERY POLICY

Signed*



Dated 30/05/2025

*unredacted copy available internally or where required

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Glossary of Terms:	
Definition	Meaning
Ethical Power	includes Ethical Power Ltd, Ethical Power Renewables Ltd, Ethical Power Development Limited, Moss Civils & Construction Limited and other associated companies under group of companies of which the foregoing are part
CEO	Chief Executive Officer

1. Introduction

Ethical Power is committed to preventing modern slavery and human trafficking occurring within our organisation and to tackling 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

2. Purpose

This policy covers all four activities.

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.

3. Organisational structure and supply chains

Ethical Power delivers high quality, sustainable and innovative energy solutions to encourage and shape a brighter future. Ethical Power'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 Ethical Power.

- *Policies:* Ethical Power has a broad library of policies that cover all working aspects of the Ethical Power group of companies. These policies have been produced by the Ethical Power management team and are all approved by and overseen by our Chief Executive Officer, Tom Kneen and Group Legal Director, Suzie Gilhooly.
- *Risk assessments:* All aspects of construction 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 Group SHEQ Director.
- *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 Managers supported by the Group legal team as

necessary 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, sophisticated 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) temporary or agency workers engaged;
- c) any outsourced activities, particularly to jurisdictions that may not have adequate safeguards;
- d) cleaning and catering suppliers;
- e) 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 working for us including contractors and consultants must observe this policy and be aware that turning a blind eye is unacceptable, and simply not an option. Through our strategy, vision and values we communicate our principles, which reflect our approach to modern slavery in our organisation, and in our supply chain.

6. Organisation responsibilities

The CEO has overall responsibility for this policy with support from our Group Legal Director and Chief Procurement/Commercial Officer for risk management and compliance with our legal and ethical obligations. We will:

- a) regularly assess the risk of modern slavery and human trafficking occurring within our organisation and supply chain, and commit to taking steps to reduce those risks;
- b) ensure we meet applicable legal obligations;
- c) ensure those leading and implementing our modern slavery strategy and compliance such as the GEO, Group Legal Director and CPO, procurement teams and contract management teams have appropriate knowledge and expertise, adequate resources and training and understand their responsibilities;
- d) maintain and communicate internally and to our suppliers, contractors and consultants clear policies and procedures setting out our expectations, aimed at preventing slavery and human trafficking, and protecting our workforce and reputation;
- e) continue to implement systems and processes to manage occupational health and

- safety risks within our organisation and promote the wellbeing of our staff;
- f) be clear about our recruitment policy;
- g) monitor our supply chains;
- h) lead by example by making appropriate checks on employees, recruitment agencies, suppliers, consultants and relevant contractors;
- i) ensure we have in place an open and transparent reporting and grievance process for all staff;
- j) seek to raise awareness so that our colleagues know what we are doing to promote their welfare; and
- k) make a clear statement to demonstrate that we take our responsibilities to our employees and our clients seriously.

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.

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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

9.1. Using agencies

Our HR department and Hiring Managers follow firm policy on using only reputable recruitment agencies that comply with regulations and legal obligations.

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

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

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

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 Head of HR.

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, training, testing and certifying Selected modules provide awareness and training in key focus areas such as Modern Slavery. The module forms part of Business Essentials training and is mandatory for all employees to participate. The module is underpinned with a test and minimum pass mark of 75%. We recognise not everyone may reach the required pass mark. Our main aim to maximise awareness and ensure conversations and mindfulness of Modern Slavery.

Newsletters and an Intranet are also ways in which Ethical Power are developing ways of communicating and developing an awareness to be vigilant, proactive and if a situation is identified react in alignment with our policy and procedure(s).

14. Monitoring

We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

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