

Anti-Slavery & Human Trafficking Policy

1. POLICY STATEMENT

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking (“modern slavery”), all of which include the deprivation of a person’s liberty by another to exploit them for personal or commercial gain.
- 1.2 Project Better Energy Limited and its subsidiaries (collectively referred to as Project Better Energy) have a zero-tolerance approach to modern slavery. Project Better Energy comprises the following subsidiaries:
- Project Better Energy Limited, trading as *Project Better Energy*, and *EG Solar*
 - Project Solar UK Limited, trading as *PSUK* or *Project Solar*
 - Curv360 Limited, trading as *Curv360*, *Project Curv*, and *Project EV*,
- 1.3 This policy applies to all persons:
- (a) working for Project Better Energy, or on our behalf, in any capacity, including employees at all levels, directors, employees, sub-contractors, agency workers, volunteers, external consultants, agencies, third-party representatives, and suppliers.
- 1.4 Project Better Energy is committed to:
- (a) acting ethically and with integrity in all our business dealings and relationships.
- (b) implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and
- (c) ensuring there is transparency in our approach to tackling modern slavery in our business and in our supply chains, consistent with our disclosure and obligations under the Modern Slavery Act 2015.
- 1.5 We expect the same high standards from all of our Suppliers and other business partners. As part of our contracting process, we include specific prohibitions against modern slavery, and we expect that our Suppliers will hold their own suppliers to the same high standards.

2. IDENTIFYING MODERN SLAVERY

- 2.1 Modern slavery may be found in:
- (a) our business, for example, our cleaning and catering workforce;
- (b) our supply chains.
- (c) outsourced activities, particularly to jurisdictions that may not have adequate modern slavery safeguards.
- 2.2 There is no typical victim of modern slavery, 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 victim of modern slavery or human trafficking:
- (a) The person is not in possession of their own passport, identification, or

travel documents.

- (b) The person is acting as though they are being instructed or coached by someone else.
- (c) The person allows others to speak for them when spoken to directly.
- (d) The person is dropped off and collected from work.
- (e) The person is withdrawn or appears frightened.
- (a) The person does not seem to be able to contact friends or family freely.
- (b) The person has limited social interaction or contact with people outside of their immediate environment.

3. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE

- 3.1 The Senior Leadership Team of Project Better Energy have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.2 The HR Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing the internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3 Management at all levels is responsible for ensuring that those reporting to them must comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

4. HOW TO RAISE CONCERN & REPORTING MODERN SLAVERY

- 4.1 All employees and Suppliers must report any incidence or suspicion of modern slavery at the earliest possible stage to:
 - (a) If you are a member of Staff, your Line Manager, or
 - (b) If you are a Supplier, your primary contact will be with the procurement manager or business contact within the company.
- 4.2 The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to or suggest a breach of this policy.
- 4.3 You must notify your manager, the compliance officer or business contact as soon as possible if you believe or suspect that a breach of this policy has occurred or may occur in the future.
- 4.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 4.5 If you believe or suspect that a breach of this policy has occurred or that it may occur, you must notify your line manager or report in accordance with our whistleblowing policy as soon as possible.
- 4.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any

of the various forms of modern slavery, raise it with your manager or through our whistleblowing policy.

- 4.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers from any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising concern. If you believe you have suffered any such treatment, you should inform the compliance officer immediately. If the matter is not resolved, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in HR Policies in Hi-Bob.

5. TRAINING AND COMMUNICATION OF THIS POLICY

- 5.1 This policy, and a training note on the issue of modern slavery,
- 5.2 This policy is available to Suppliers on our websites.
- 5.3 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 5.4 Our commitment to addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

6. BREACHES OF THIS POLICY

- 6.1 Any Staff member who breaches this policy may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 6.2 Project Better Energy may terminate its relationship with a Supplier if it is in breach of this policy.

7. POLICY REVIEW

- 7.1 The Group HR Director, in conjunction with the Compliance Officer, is responsible for reviewing this policy as necessary to ensure that it meets legal and ethical requirements and reflects best practice.
- 7.2 This policy does not form part of any contract of employment and may be amended at any time.