



Modern Slavery Policy



The smart future of green energy





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1 Introduction

1.1 Modern slavery is a serious crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal, political or commercial gain.

1.2 The purpose of this policy is to support international efforts against slavery, child labour and human trafficking in accordance with the UK Modern Slavery Act 2015 and the Company's own principles.

1.3 It is our policy to conduct all of our business in an honest and ethical manner. We are opposed to any form of modern slavery and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate by implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.4 We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we expect to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

1.5 This policy is a crucial element of that effort. It sets out the steps all of us must take to prevent modern slavery occurring in the Company's businesses in order to comply with relevant legislation and the Company's requirements.

1.6 This policy has the full support of the Company's board, and it is the board's commitment to make sure it is followed. However, the policy needs the full support of you, the Company's staff, to make it work. In all our interests, the Company is relying on you to give the policy that support.

2 Who is covered by the policy?

2.1 This policy applies to all employees.

2.2 The policy also applies to all individuals working at all levels and grades, including officers, directors, senior managers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, suppliers, external consultants, third party representatives and business partners.

2.3 This policy does not form part of any employee's contract of employment and it may be amended at any time.

3 What does 'Modern Slavery' include?

3.1 “**Slavery**” includes any coerced or forced labour, servitude, indentured servitude, detained servitude, sexual exploitation, removal of organs, or securing labour or services by force, threat or deception.

3.2 “**Child labour**” means hazardous labour or labour provided by a child below a basic minimum age.

3.3 “**Human trafficking**” includes the recruitment, transportation, transfer, harbouring or receipt of persons using improper means (including by force, abduction, fraud or coercion) for an illegal or improper purpose, including forced labour or sexual exploitation. It includes the transportation of people in violation of any applicable international laws, and includes people smuggling, regardless of whether the person being transported gave consent at any point in time.

4 What do we do to prevent slavery and human trafficking in our business?

- 4.1** We make appropriate checks on all employees to know who is working for us.
- 4.2** We provide every employee with a written contract of employment. We pay every employee in accordance with the law. We also comply with our legal obligations to provide safe and healthy working conditions for all our employees.
- 4.3** We make appropriate checks through a prequalification process on our suppliers and contractors to know who is working for us. Prequalification status is reviewed on a regular basis.
- 4.4** We review and update (as appropriate, for example due to changes in legislation) our business practices regularly.
- 4.5** We expect both ourselves and our suppliers to comply with all applicable local laws and regulations to their site(s) of operations, to provide safe working conditions, treat workers with dignity and respect, and act fairly and ethically with proper consideration given to human rights.
- 4.6** We recognise that due diligence to prevent slavery and human trafficking within our business is an ongoing process that needs to be reviewed and adapted as our business activities evolve (for example, when we work with new suppliers and business partners, or when we undertake new areas of business). We also understand that in certain regions of the world, there could be a higher risk of human rights abuses happening, and in such cases we increase the level of our due diligence in order to better identify and manage potential human rights related risks.

5 What must you do?

- 5.1** You must make sure that you read, understand and comply with this policy.
- 5.2** The prevention, detection and reporting of modern slavery in any part of our business or supply chains are 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.
- 5.3** You must notify us as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 5.4** We strongly encourage you to raise any concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.
- 5.5** 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, please raise it with us as early as possible.

6 How to raise a concern

6.1 If you need to notify us of a possible conflict with this policy, or if you want to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier, you can:

6.1.1 speak to your manager;

6.1.2 speak to the Compliance Manager - Russell Farnhill; or

6.1.3 notify our confidential email helpline at ethics-team@innova.co.uk.

7 Protection

7.1 People who raise concerns or report another's wrongdoing are sometimes worried about possible repercussions. 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.

7.2 We are committed to ensuring no one suffers 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 part 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 a concern.

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Communication

8.1 Our no tolerance approach to 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 thereafter.

8.2 This ethical stance is good for our business and is non-negotiable.

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Breaches of this policy

9.1 Any employee who breaches this policy or fails to report any breach they become aware of will face disciplinary action, which could result in dismissal for gross misconduct.

9.2 We reserve our right to terminate our contractual relationship with other individuals and organisations working on our behalf if they breach this policy.

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Who is responsible for this policy?

10.1 The directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

10.2 Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training as required.

10.3 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Manager (Russell Farnhill at ethics-team@innova.co.uk).



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