

# **ANTI-SLAVERY & HUMAN TRAFFICKING POLICY AND GUIDELINES**

<b>Revision No:</b>	<b>3</b>
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### Document Change Control

All changes are to be agreed and authorised by the CEO.

### Document Change Record

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### Document Sign-off

	Signed	Date
CEO		31 March 2023

All changes are logged in the Policies Document Control Register.

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## **1. POLICY STATEMENT**

- 1.1 This policy applies to Brockwell Energy Limited and all of its subsidiaries (the “Company”).
- 1.2 The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.
- 1.3 Modern slavery is a despicable form of organised crime in which people are exploited for criminal gain. It is inhumane, unethical and damaging to society, yet it remains an issue in corporate supply chains around the world. The Company is committed to the eradication of slavery and human trafficking and this statement is made in compliance with section 54(1) of the Modern Slavery Act 2015. It sets out the Company’s policy and the steps that the Company is taking to prohibit any form of forced labour or slavery throughout its supply chain.
- 1.4 The Company will not knowingly use forced labour, slavery or unlawful child labour in providing any of its services or products, nor will it accept services or products from suppliers that employ or utilise forced or unlawful child labour or any form of slavery.
- 1.5 This policy reflects the Company’s commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.
- 1.6 The Company will continue to review its policies and processes to ensure they meet both the legal and ethical standards required in its supply chain.
- 1.7 This policy does not form part of any employee’s contract of employment and it may be amended at any time.

## **2. RESPONSIBILITY FOR THE POLICY**

- 2.1 The Company’s Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2.2 The Chief Executive Officer has primary and day-to-day responsibility for implementing this policy and the Chief Financial Officer has responsibility for monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 2.3 All managers are responsible for ensuring those reporting to them understand and comply with this policy. Any concerns can be raised via the whistleblowing policy and staff must at all times follow the company’s code of conduct for acceptable staff behaviour.

## **3. COMPLIANCE WITH THE POLICY**

- 3.1 Employees must ensure that they read, understand and comply with this policy.
- 3.2 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.
- 3.3 Employees must notify the Chief Financial Officer as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 3.4 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 the Chief Financial Officer

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- 3.5 The Company encourages 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 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.
- 3.6 The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners, evaluating the modern slavery and human trafficking risks of each new supplier, invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

#### **4. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 4.1 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.
- 4.2 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 thereafter.

#### **5. BREACHES OF THIS POLICY**

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.