

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 in order to exploit them for personal or commercial gain.

1.2 Project Better Energy Ltd has a zero-tolerance approach to modern slavery.

1.3 This policy applies to all persons:

- (a) working for Project Better Energy Ltd, 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 Ltd 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. 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

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- (e) The person is withdrawn or appears frightened.
- (f) The person does not seem to be able to contact friends or family freely.
- (g) The person has limited social interaction or contact with people outside of their immediate environment.

3. RESPONSIBILITY FOR THIS POLICY AND COMPLIANCE

3.1 Directors of Project Better Energy Ltd have overall responsibility for ensuring this policy complies with the legal and ethical obligations.

3.2 All Staff members must comply with this policy.

3.3 All Suppliers must comply with this policy.

4. 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's manager or business contact within the company.

5. PUBLICATION 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 the Project Better Energy Ltd website.

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 Ltd may terminate its relationship with a Supplier if it is in breach of this policy.

7. POLICY REVIEW

7.1 The CEO, in conjunction with Human Resources and the Compliance manager, 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 anytime