

OnPath Energy Policy

# Modern Slavery Act 2015 Policy and Statement

The Modern Slavery Act 2015 (“the Act”) came into effect on 29th October 2015. This statement is made pursuant to Section 54 (1) of the Act and constitutes OnPath Energy’s slavery and human trafficking statement for the financial year ending 30 September 2023. It sets out the steps we have taken, and continue to take, to ensure that slavery and human trafficking is not taking place in our supply chain or in any part of our business.



## OnPath Energy and its Business

OnPath Energy is a County Durham based business, with offices in Scotland and England, employing around 100 people working on projects across the UK. As a renewable energy company we design, develop, construct, and operate renewable energy projects across a range of technologies including onshore wind, solar and batteries.

This statement applies to each of our group holding companies and all their subsidiary companies, regardless of their turnover.

## Our Policies

The following policies underpin our zero tolerance approach to slavery and human trafficking, both from our own aim to comply with the Act and also our expectation that our suppliers and their supply chains will take all reasonable and practicable steps to comply with the Act:

- this policy and statement
- our ESG policy
- our pre-qualification process and standard terms of business
- our other associated policies and procedures including:
  - Human Rights
  - External Grievance and Reporting
  - Anti Bribery and Corruption
  - Public Interest Disclosure (whistleblowing)
  - Personal Conduct
  - Equal Opportunities
  - Environmental and Sustainability
  - Social Media
  - Community

## Together to a greener future

Our ESG and Sustainability policy is a continuing statement of our intent to meet the expectations of those affected by our work. The key strands of this are today:

- **COMMUNITY** – how we support communities for areas hosting our projects and nationally.
- **ENVIRONMENT** - how we create positive environmental legacies from our projects.
- **OUR PEOPLE** – how we help create a great place to work at OnPath
- **OUR BUSINESS PARTNERS** – how we work ethically with our suppliers promote local businesses.

Our vision at OnPath Energy is to power a more sustainable future through renewable energy.

## Our Processes

Our procurement activities take place in England and Scotland and take two forms, namely the requirement for the supply of goods and the supply of professional services and contractors.

Our professional advisors and contractors are UK and EU based, whilst our suppliers of goods are predominantly UK, EU and USA based global organisations.

Our key suppliers are required to complete a rigorous pre-qualification exercise prior to appointment which requires them to provide us with their Ethical Procurement Policy and commitment to operate in accordance with our 'Development with Care' approach in terms of engagement with local communities.

Our standard terms and conditions used for the whole supply chain have been adapted to ensure our professional advisors, contractors and suppliers comply with the provisions of the Modern Slavery Act 2015 and the Bribery Act 2010 and GDPR.

This statement was approved by the Board of OnPath Energy Limited and each of its associated companies and their principal operating subsidiaries in July 2024.

## Further steps to be undertaken

We are committed to continually review and monitor our supply chain to ensure that high standards of ethical procurement are maintained.

## Responsibility for, and compliance with this policy

The Boards of each of our group holding companies have overall responsibility for ensuring that this statement complies with our legal and ethical obligations under the Act. The Boards of each of our principal operating subsidiary companies have adopted its principles and have committed to its implementation. All staff working for and with us (including employees, consultants, contractors and agency workers) are encouraged to report any concerns about modern slavery in any part of our business in accordance with our Personal Conduct and Public Interest Disclosure policies.



Signed for and on behalf of the board by:  
RICHARD DUNKLEY • CEO  
July 2024