

OnPath code of conduct

Business code of conduct

1. Introduction

All leading businesses are successful because they create something that society needs and do so in a way that is better than all their competitors.



Our company vision is to be the leading land-based developer of complex renewable energy infrastructure in the United Kingdom. As a business that originates, develops, constructs and operates renewable assets, the complexities of what we do requires us to ensure we deploy the highest professional standards in all aspects of our work, enabling us to navigate the multi-dimensional challenges our business faces.

This Business Code of Conduct is a key part of our cultural story. It sets the tone for who we want to be. It outlines the principles and standards that guide our actions and decisions as a renewable energy company. This Code covers many issues at a high level, while other company policies deal with specific issues in greater detail. Our commitment to sustainability, ethical business practices, and legal compliance is paramount to our operations. All directors, employees, contractors, and partners must adhere to this Code to maintain our reputation and contribute positively to society and the environment.

2. Compliance with Laws and Regulations

Adherence to Laws: We comply with all applicable UK laws, regulations, and industry standards, including those related to renewable energy, environmental protection, health and safety, and employment practices.

Permits and Approvals: We ensure all necessary permits, licenses, and approvals are obtained before commencing any project and are maintained throughout the project's lifecycle.

Transparency with Authorities: We maintain honest and transparent relationships with regulatory authorities and promptly address any compliance issues that arise.

3. Environmental Stewardship

Sustainable Practices: We are committed to minimising the environmental impact of our operations. This includes reducing carbon emissions, protecting natural habitats, and promoting biodiversity in areas affected by our projects.

Resource Management: We use resources efficiently and promote the use of renewable materials in our projects wherever possible.

Environmental Impact Assessments (EIA): We conduct thorough EIAs before initiating any project to identify potential environmental risks and implement measures to mitigate them.

4. Ethical Business Conduct

Integrity: We conduct our business with honesty, integrity, and fairness. Bribery, corruption, and unethical behaviour are strictly prohibited.

Conflict of Interest: Directors, employees and contractors must avoid or resolve situations where their personal interests conflict with the interests of the company. Any potential conflicts must be honestly and promptly disclosed to your manager.

Fair Competition: We believe in fair competition and do not engage in anti-competitive practices. We comply with all relevant competition laws.

5. Health and Safety

Safety Focus: We prioritise the health and safety of our employees, contractors, and communities. We adhere to all relevant health and safety regulations and strive for a zero-accident workplace.

Training and Awareness: We provide regular training and resources to our employees to ensure they are aware of potential hazards and can carry out their duties safely.

Incident Reporting: All accidents, incidents, or near misses must be reported immediately, and corrective actions must be taken to prevent future occurrences.

6. Community Engagement

Positive Impact: We are committed to creating positive social and economic impacts in the communities where we operate. We engage with local stakeholders to understand their concerns and ensure our projects benefit the wider community.

Respect for Local Culture: We respect the rights, cultures, and traditions of local communities and work to ensure that our projects are implemented in a socially responsible manner.

Community Consultation: We actively involve communities in our project planning and decision-making processes to ensure transparency and to foster trust.

7. Human Rights and Labour Practices

Respect for Human Rights: We respect and uphold the human rights of all individuals affected by our operations, in line with the UK Human Rights Act and international standards.

Non-Discrimination: We are committed to

providing a workplace free from discrimination, harassment, and bullying. All employees are treated fairly, regardless of race, gender, age, religion, disability, or sexual orientation.

Fair Wages and Working Conditions: We provide fair wages, benefits, and working conditions to all employees, in compliance with UK labour laws and international labour standards.

We are an accredited member of the Living Wage Foundation, reflecting our commitment to fair pay and ethical employment practices. This means that we voluntarily ensure all our employees and contractors receive a wage that meets the real cost of living, not just the government minimum.

By adhering to the Living Wage Foundation's standards, we demonstrate our dedication to supporting the financial wellbeing of our workforce and contributing to a fairer society.

8. Confidentiality and Data Protection

Confidential Information: Directors and employees must protect confidential information related to our business, partners, colleagues, and clients. Unauthorised disclosure of such information is prohibited.

Data Protection: We comply with the UK Data Protection Act and GDPR regulations to ensure that personal and sensitive data is handled securely and responsibly.

Cybersecurity: We implement robust cybersecurity measures to protect our systems and data from unauthorised access, breaches, and other cyber threats.

9. Sustainability and Innovation

Commitment to Innovation: We continuously seek innovative solutions to enhance our renewable energy technologies and improve efficiency.

Sustainable Development Goals (SDGs): We align our business practices with the UN Sustainable Development Goals, particularly those related to affordable and clean energy, climate action, and sustainable communities in order to promote economic, social, and environmental sustainability.

Continuous Improvement: We regularly review and update our sustainability practices to ensure we are leading the way in responsible renewable energy development.

10. Reporting and Whistleblowing

Open Communication: We encourage employees and stakeholders to report any concerns or violations of this Code. We are committed to investigating all reports promptly and fairly.

Whistleblower Protection: Individuals who report unethical behaviour or violations of this Code in good faith are protected from retaliation. We ensure that concerns can be raised confidentially and without fear of reprisal.

Individuals may contact our Ethics Line, which is a confidential and secure channel through which they can report concerns or seek guidance regarding ethical issues, compliance, or any behaviour that may not align with our company's

values. This service is available to all employees and is operated by an independent external provider to ensure anonymity and impartiality. Details of the Ethics Line are on <https://report.syntrio.com/onpathenergy>.

11. Compliance, Enforcement and Updates

Responsibility: All directors, employees, contractors, and partners are responsible for adhering to this Code of Conduct. If you have any questions about this Code, speak to your manager or a member of the HR or Legal teams. Managers are responsible for ensuring compliance within their teams.

Disciplinary Action: Violations of this Code may result in disciplinary action, up to and including termination of employment or contract.

Review and Updates: This Code of Conduct is reviewed regularly and updated as necessary to reflect changes in laws, regulations, and industry standards.

12. Acknowledgment

All directors, employees, contractors, and partners must acknowledge that they have read, understood, and agree to comply with this Business Code of Conduct.



Signed for and on behalf of the board by:
RICHARD DUNKLEY • CEO
April 2025