



## Anti-Slavery policy

**LSP Renewables** is a renewable energy talent & recruitment specialist dedicated to servicing the international renewable energy industry covering permanent and contract positions across the full spectrum of renewable energy sources.

### Overview

Our ambition is to positively contribute to the complete removal of CO2 from the global energy generation industry. We passionately believe in reducing global CO2 emissions in order to safeguard the long-term future of our planet. This passion fuels our desire to provide best in class talent and career support services to the companies and people working to achieve a brighter, greener future

We at LSP Renewables are committed to achieving the highest standards in the conduct of our business and activities worldwide. Whilst we primarily work with suppliers, contractors and clients that are not usually considered to be at a high risk of modern slavery, we recognise the risk and continuously uphold our zero-tolerance policy of slavery or human trafficking in any part of our own business or in any of our supply chains. We expect all who have, or seek to have, a business relationship with LSP Renewables to comply themselves with this statement and to act at all times in a way which is consistent with our anti-slavery policies and values.

### Our Supply Chain

Our supply chain supports LSP Renewables to work as a global recruitment company. We work with a range of suppliers, clients and contractors which requires us to source candidates for clients.

As part of our culture of good ethics and practice LSP Renewables operates a set of values which reflect our relationships with our principal stakeholders: customers, shareholders, suppliers, contractors and employees. In all of its business dealings, LSP Renewables opposes the exploitation of individuals in any form, particularly the offences created by the Modern Slavery Act 2015. LSP Renewables is committed to opposing modern slavery in all its forms and preventing it by whatever means possible. LSP Renewables expects the same of all who work for and with it.

We periodically access our supply chain and conduct risk assessments. We expect high standards of ethical behaviour from all of our contractors and suppliers. We updated our processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We also expect our suppliers to hold their own suppliers to the same requirements.

### Steps for the prevention of modern slavery

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors and suppliers, and we updated our processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We expect our suppliers to hold their own suppliers to the same requirements.

All employees and suppliers are required to comply with LSP Renewables procedures to



prevent modern slavery and to conduct business in a manner such that modern slavery is prevented.

While LSP Renewables complies with the Modern Slavery Act 2015, it acknowledges that it does not control the conduct of those in our supply chains.

To underpin our compliance with practical steps, LSP Renewables have implemented the following measures:

- conduct of periodic risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can and are, focused on those areas;
- engage with our suppliers both to convey to them our anti-slavery policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- introduced supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- introduced contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion; and
- conducting a full compliance check on the contractors and the personal service companies (PSC) we engage.

### **Responsibility for the policy**

Responsibility for the prevention of modern slavery rests with LSP Renewables' Directors and senior management. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers are responsible for ensuring that their staff understand and comply with this policy and are given routine training on it.

**Actions to report modern slavery or human trafficking**  
LSP Renewables carry out a "Whistleblowing Procedure" which is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Procedure applies to all employees in which we advise employees to immediately raise any concerns with a Director of LSP Renewables.

Concerns should be raised if any employee or relevant body:

- suspects a person acting on behalf of LSP Renewables is seeking to exploit another in a way which could amount to modern slavery;
- suspects that a person acting on behalf of one of LSP Renewables' suppliers is seeking to exploit another in a way which could amount to modern slavery;



- has received an approach from a person acting on behalf of LSP Renewables who has invited the participation in acts which could result in offences under the Modern Slavery Act 2015 being committed;

- has information which leads to the reasonable conclusion that a person acting on behalf of LSP Renewables or any supplier is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports are kept confidential except where LSP Renewables is required to pass information to relevant

authorities. LSP Renewables ensures full compliance in working with the relevant authorities to assist in the prevention of Modern Slavery.

### **Safeguards**

We encourage 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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against an employee making such claims or allegations.

### **Training and further steps**

LSP Renewables is working towards the development of a more frequent training process given to staff ensuring that they understand and comply with the policy. Even if staff have already been provided with training on anti-slavery and human trafficking measures, we intend to provide staff with refresher courses yearly to reinforce the policies and procedures we have in place.

### **Communication and awareness of this policy**

We aim to communicate our zero-tolerance approach to modern slavery to all suppliers and contractors and business partners at the outset of our business relationship with them and to reinforce it as appropriate thereafter.

### **Review**

This Modern Slavery Statement is reviewed by LSP Renewables' Directors on an annual basis and is updated annually in accordance with any amendments and additions to the Modern Slavery Act.



A handwritten signature in black ink, appearing to read 'A. C. E.' followed by a long horizontal stroke.

Updated January 2025