



Spirit Solar Limited t/a Spirit Energy

Modern Slavery Policy

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Revision History

Version	Date of issue	Approved by	Revision notes
V2	14 th January 2018	EC	



1. Introduction

What is slavery and human trafficking?

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, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Spirit Solar has a zero-tolerance approach to modern slavery and human trafficking. We are fully committed to preventing the occurrence of slavery or trafficking within our business and throughout our supply chain.

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Spirit Solar has taken and continues to take to ensure that modern slavery or human trafficking does not occur within our business or our business supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Spirit Solar holds a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings. This will be done by ensuring that we put effective systems and control measures in place to safeguard against any form of modern slavery occurring within our business or its supply chain.

1.1 About Spirit Solar

Spirit Solar designs and installs energy generation and energy efficient technologies in the UK. Key technologies are Solar PV, EV chargers, LED lighting and battery storage systems.

Most of our products are bought in the UK from suppliers and distributors and we are therefore dependent to some extent on the integrity of our suppliers to achieve implementation of this policy.

1.2 Our high-risk areas

High risk areas include the sourcing of battery storage products which may use cobalt mined by children, and the sourcing of any product from the Far East which may have used child labour.

Installation labour is generally in-house; however for agency staff and sub-contract labour, our policy is as follows

- Agencies supplying staff. A request will be made to confirm that they have complied with the Act and obtained proof of eligibility to work, references, qualifications, proof of National Insurance and bank details to ensure that each worker is acting in their own right.
- Subcontract labour. Subcontractors will be asked about their understanding and compliance of the act as part of their PQQ (Pre- Qualification Questionnaire) before a contract is made.

For suppliers of project based materials, goods and services which/who we conduct regular business with, we require a completion of a supplier questionnaire which seeks confirmation of their understanding and compliance of the Act and that they have appropriate preventative measures in place.



In regards to ad-hoc suppliers, we will rely on their integrity as a business as this relationship is deemed a low risk. However, should the frequency of usage and a relationship with an ad-hoc company develop, they will be required to complete a supplier questionnaire as above.

Low risk procurement areas include:

- PPE and workwear
- IT hardware, software and telecommunications
- Vehicles
- Office Furniture
- Training Services
- Travel Services

2. Commitments

2.1 Our policies

To ensure that we are conducting our business in an ethical and transparent manner, we operate a small number of internal policies.

- On induction, staff will be made aware of the Modern Slavery Act, including its definitions of human trafficking and slavery.
- We instruct staff to notify a Director should they suspect a case of slavery or trafficking.
- We regularly review our documentation and policies to include prohibitions in respect of complying with the human trafficking and slavery regulations.

2.2 Our suppliers

Spirit Solar operates a supplier policy and maintains a preferred supplier list. Our anti-slavery policy forms part of our vetting process for key suppliers and they are required to confirm that no part of their business operations contradicts this policy.

Before adding a sub-contractor to our preferred supplier list, all suppliers must complete a PQQ to prove their competency. This questionnaire includes the following questions in regards to adhering to the Modern Slavery Act 2015:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.



Where applicable, an on-site audit to include a review of working conditions will be undertaken.

2.3 Responsibilities of employees

All employees must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of slavery or human trafficking is the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Employees must notify a Director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future.

An employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

- How can an employee raise a concern?

All employees are encouraged to raise concerns about any suspected malpractice as early as possible. If they are unsure, they should speak to a Director who will take appropriate measures.

2.4 Training and communication

Training on this policy is included within our induction process for all new employees and other workers.

2.5 Monitoring and review

The Managing Director is ultimately responsible for the implementation and adherence to this policy and that it complies with our legal and ethical obligations.

They are also responsible for dealing with any queries on the policy and clarifying any interpretation. Management at all levels are also responsible for ensuring that those reporting to them are made of the policy and understand it.

The Managing Director will monitor the effectiveness and review the implementation of this policy on a regular basis. Any improvements identified will be made as soon as possible and all workers notified of any amendments or changes.

It is the responsibility of the Managing Director to ensure that this policy is reviewed and updated on an annual basis, or when there is a change to the current legislation.

3. Signature

Signed on issue by



..... Ian Charles

Ian Charles

Director