

Modern Slavery Statement

This statement sets out Boston Energy's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023.

In previous years, our organisation has published its statement no later than 30 June. We recognise that we are publishing this statement later than expected.

As part of the renewable energy sector, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continue to take our responsibility very seriously during the coronavirus pandemic.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Boston Energy;

- Boston Energy is a technical services provider in the Renewable Energy Industry.

In 2023/2024 we currently operated in the following countries:

- United Kingdom
- United States of America
- Denmark
- Netherlands
- Germany
- Poland

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** Our people and our compliance team are responsible for ensuring that we have people facing policies which maintain compliance;
- **Investigations/due diligence:** Our people team are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking;
- **Training:** All hiring managers will be provided with guidance and training on the risk of modern slavery and how to identify the signs of slavery and human trafficking;

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Business Conduct Guidelines** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

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- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our speaking up page on our website.
- **Recruitment policy** We have a robust onboarding process ensuring that all new starters complete a new starter checklist, right to work documentation is obtained and verified, bank accounts are verified and all colleagues are inducted. Each new starter understands the risk of modern slavery through our business conduct guidelines. We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Our due diligence and reviews include select the relevant actions from the list below:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular provide examples such as participation in "Stronger together."

Performance indicators

We have reviewed our key performance indicators (KPIs). As a result, we are;

- requiring all managers to have completed training on modern slavery;
- developing a system for supply chain verification expected to be in place by end 2025 whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be completed by end 2025 whereby we evaluate all existing suppliers.

Training

We require HR professionals within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

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- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

Awareness-raising programme

As well as training staff, we have raised awareness of modern slavery issues by distributing circulating a series of emails to staff.

The emails explain to staff select the relevant issues from the list below:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

Board approval

This statement was approved on December 2024 by our board of directors members, who review and update it annually.

Director's signature:



Director's name:

Julian Cattermole

Date:

23/12/2024

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