

# Modern Slavery Act Transparency Statement 2023



## Bluestone Energy Limited

Statement issued in accordance with the Modern Slavery Act 2015 (“the Act”) in relation to the period 1 April 2023 to 31 March 2024 (“the Statement Period”).

### Introduction from the Managing Director

We remain committed to improving our practices to combat slavery and human trafficking, with a view to ultimately achieving the best possible practices in this regard.

### Organisation's structure

Bluestone Energy is a UK based renewable energy developer. We provide projects and services to global renewable energy funding organisations who purchase renewable assets in the UK and own and operate them on behalf of our clients for a period of up to 40 years.

### Our supply chains

Aside from services provided to our funding partners, which services we consider to be low risk in the present context, our supply chains include:

- Planning Consultants – UK based companies providing full end to end planning services.
- ICP/EPC Contractors – providing expert advice and cost analysis to build and deliver our projects on behalf of our funding partners.

### Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy (see below) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have raised this as a particular issue with relevant members of the management team (including in particular commercial, procurement, planning, technical and development). We have carefully considered our various supply chains and identified particular areas of risk, albeit, the services we offer are considered low risk in the present context.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Encourage vigilance as to potential risk areas in our supply chains.
- Encourage whistle-blowing and protect whistle blowers.

### **Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. To ensure those in our supply chains as well as our contractors comply with our values, we ask for regular updates and explanations where suppliers have breached our values pertaining to slavery and trafficking.

### **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided training to such of our staff members as are likely to be affected by the Act and its requirements.

### **Further steps taken in the Statement Period**

In addition to the above, during the Statement Period we will continue to monitor compliance with the Act generally across our supply chain and specifically issued compliance statements to our contractors and suppliers, requesting their confirmation that no slavery or human trafficking has taken place in their business or supply chains in the 12-month period ending 31 March 2024 and will follow up any contractors and suppliers that fail to provide this confirmation in a timely fashion.

### **Further steps to be taken**

During the 12 month period to 31 March 2024 we shall:

- follow up on any outstanding compliance statements relating to the 12-month period ending 31 March 2024;
- issue compliance statements to our contractors and suppliers and request their confirmation that no slavery or human trafficking has taken place in their business or supply chains in the Statement Period and follow up any contractors and suppliers that fail to provide this confirmation in a timely fashion;
- continue to monitor compliance with the Act more generally.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the period ended 31 March 2024.

Andy MacPherson  
Managing Director

## **Anti-Slavery and Human Trafficking Policy**

### **1. POLICY STATEMENT**

1.1 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. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also 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 disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **2. RESPONSIBILITY FOR THE POLICY**

2.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The board of directors has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. 2.3 Management at all levels is responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

### **3. COMPLIANCE WITH THE POLICY**

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.

3.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

3.6 We aim to 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. If you believe that you have suffered any such treatment, you should inform Legal Counsel immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

#### 4. COMMUNICATION AND AWARENESS OF THIS POLICY

4.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us and who have responsibility for procurement or managing supply chains, and regular training will be provided as necessary.

4.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### 5. BREACHES OF THIS POLICY

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with suppliers, contractors, business partners and any other individuals and organisations working with us or on our behalf if they breach this policy.