Human Rights Policy

Background

This policy statement relates to all employees at Energys Group Limited (comprising of Energy Conservation Solutions Ltd, Cube Lighting & Design and Cube Solar Installations Limited).

Energys Group seeks to uphold all internationally recognised Human Rights and to ensure fair and equitable treatment for all staff wherever our operations are located. In particular all of our Companies will respect the principles set out in the United Nations Universal Declaration of Human Rights. In this regard, the following minimum standards must be adhered to by all Group Companies. Where local practice or good business practice dictates, then higher standards should be aspired to.

Standards

Standard 1: The Law is applied

Energys Group companies will comply with all national and other applicable law and regulations regarding human rights, working practices and standards.

Standard 2: Employment is freely chosen

Energys Group companies will ensure that there is no forced, bonded or involuntary labour and that workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Standard 3: Freedom of association and the right to collective bargaining are respected

Energys Group companies will ensure that (subject to the laws of the country of operation):

- Workers, without distinction, have the right to join or form trade unions of their own choosing and where a significant proportion of the workforce agree, to bargain collectively
- The Company will adopt an open attitude towards the activities of trade unions and their organisational activities
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace
- Where the right to freedom of association and collective bargaining is restricted under law, the employer should consider facilitating, and not hindering, the development of legal parallel means for independent and free association and bargaining

Standard 4: Working conditions are safe and healthy

- A safe and healthy working environment shall be provided, bearing in mind international standards, the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working practice and environment

- Workers shall receive suitable and sufficient health and safety training, in order that they fully understand the hazards associated with the work activity & environment and the correct practices required to minimise the risks
- Access to clean toilet facilities, drinkable water and, if appropriate, sanitary facilities for food storage shall be provided as required
- Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers
- Each company shall appoint a management board member to be responsible for health and safety

Standard 5: Child labour is eliminated

- Employment of persons under the age of 16 is prohibited except in exceptional circumstances which must be approved by the Group CEO
- Persons under 18 shall not be employed at night or in hazardous conditions

Standard 6: Living wages are paid

- Wages and benefits paid for a standard working week shall meet, at a minimum, national legal standards
- In any event, wages should not be paid in kind and should be enough to meet basic needs
- All workers should be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid
- Excessive deductions from wages as a disciplinary measure should not be permitted. Deductions from wages not provided for by national law should only be permitted with the expressed permission (without duress) of the worker concerned. All disciplinary measures should be recorded

Standard 7: Working hours are not excessive

- Standard working hours shall comply with national laws
- Workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average. Overtime requested by us shall be voluntary and a single request shall not cover multiple overtime requirements over a significant time period, unless the company is party to a collective agreement which requires overtime work in accordance with such agreement. This agreement must be freely negotiated with worker organisations and represent a significant proportion of the workplace. Overtime shall always be compensated at a premium rate

Standard 8. No discrimination is practised

- A policy of equality for all should be in place and there should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation

Standard 9. Regular employment is provided

- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice
- Obligations to the Company under labour or social security laws and regulations arising from the regular employment relationship should not be avoided
- Examples include the abuse of labour-only contracting, sub-contracting, or homeworking arrangements, through apprenticeship schemes where there is no real intent either to impart skills or provide regular employment, or excessive repetition in the use of fixed-term contracts of employment for a single individual

Standard 10: No harsh or inhumane treatment is allowed

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited

Reporting Procedure

If you have a concern that a breach of these Standards is occurring then the issue should first be raised with your line manager orally or in writing.

If you are unable to raise the matter with your line manager for whatever reason, please raise the matter with the HR & Compliance Manager.

If these channels have been followed and you still have concerns, or if you feel the matter is so serious that you cannot discuss it with any of the above, please contact:

Name:	Kevin Cox
Position:	Managing Director
Telephone:	01403 786212
Email:	kevin.cox@energysgroup.com

Investigation

Energys Group will investigate all potential incidents of non-compliance with these standards. Any concerns raised will be treated fairly and properly. We will not tolerate the harassment or victimisation of anyone raising a genuine concern.

Illegal Workers Policy

Energys Group is committed to prevent illegal working by carrying out document checks to confirm if a person has the right to work in the UK. These controls are applicable to all potential and current employees. The checking process are non-discriminatory and in accordance with statutory equalities duties.

Energys Group check every employees' entitlement to work in the UK prior to confirming their position within the business, in accordance with the Home Office guidance (for Employers on Preventing Illegal Working). We also ensure compliance with sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006.

Working status screening is undertaken on every person working for the company. No one can start work until a successful screening has taken place. For this they must provide a valid UK passport, Birth Certificate, Driving Licence or permanent Residence Permit. These items are checked for validity, date of issue and expiry as well as checking photographs. The document is copied to be saved in the individuals personnel file. Only original documents are accepted. The HR Manager checks that a job applicant is allowed to work in the UK:

https://www.gov.uk/check-job-applicant-right-to-work

Energys Group check with all our labour partners to ensure they have completed the necessary checks at their end for their employees, prior to accepting them as a labour partner working with us.

Every employee must provide their National Insurance number on their new starter form and this is checked when they commence work and are added to our payroll system.

Employee records are retained by the Company for a minimum of 2 years after ceasing to work for the Company.

This policy will be reviewed on an annual basis of if there is a change to legislation.

Modern Slavery and Human Trafficking Policy

Policy Statement

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. Energys Group (comprising of Energy Conservation Solutions Ltd and Energys Group Ltd) has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any part of its supply chain.

Energys Group is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015. Energys Group expect the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, Energys Group includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and Energys Group expect that its suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for Energys Group or on its behalf in any capacity, including employees at all levels, directors, officers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment.

Responsibility For The Policy

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

The Managing Director has primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

Compliance With The Policy

The prevention, detection and reporting of modern slavery in any part of the business or supply chain is the responsibility of all those working for Energys Group or under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Modern Slavery Policy

Employees must notify their manager or the Syndicate Compliance Officer as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chain of any supplier tier at the earliest possible stage.

If an employee believes or suspects that a breach of this policy has occurred or that it may occur, a report must be made to the appropriate line manager or report must be made as soon as possible in accordance with the Energys Group Whistleblowing Policy.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Energys Group supply chain constitutes any of the various forms of modern slavery, it must be raised with the appropriate line manager or the Managing Director.

Energys Group aims 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. Energys Group is 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 the business or in any of Energys Group supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any member of staff believes that they have suffered any such treatment, they should inform the Managing Director immediately. If the matter is not remedied, the member of staff should raise it formally using our Grievance Procedure.

Service-level agreement

Energys Group is committed to a prompt, consistent, and victim-centered response to all reports of suspected modern slavery or human trafficking within our own operations and across our supply chains. This commitment is underpinned by the following Service Level Agreement (SLA):

Upon receiving a report of suspected modern slavery, Energys Group commits to the following response times and actions:

Initial Acknowledgment & Triage:

- Within 24 hours of receiving a report during business days, an initial acknowledgment will be sent to the reporter (where contact details are provided).
- Relevant line managers will conduct an initial review to assess the severity and urgency of the report.

Investigation Initiation:

- A formal investigation will be launched within 3 business days of the initial assessment for credible reports.
- This investigation will involve relevant internal departments and, where deemed necessary, will engage external specialists.

Victim Safeguarding and Support:

- Immediate action (within 6 hours for urgent cases) will be taken to ensure the safety, well-being, and rights of any identified or suspected victims.
- Our priority is to connect victims with appropriate support services. All actions regarding victims will be taken with their informed consent where possible.

Supplier Cooperation and Remediation:

- Policy: When a supplier alerts us to a modern slavery incident within their operations, cooperates fully with authorities, actively implements corrective actions, and is not found to be complicit in the abuse, Energys Group will not have a standard policy to immediately delist or suspend trade with that supplier due to that specific incident.
- Action: To work collaboratively with our suppliers, our SLAs with suppliers will include obligations for them to report incidents promptly and cooperate in remediation efforts.

Corrective Action Plan Development:

- For confirmed incidents, a comprehensive corrective action plan will be developed within 10 business days of confirmation.
- This plan will detail specific measures to address root causes, provide remedy to victims, and prevent recurrence. Progress on corrective actions will be monitored closely.

Communication and Closure:

- Regular updates will be provided to relevant internal and external stakeholders on the progress of investigations and corrective actions.
- Cases will be formally closed upon verification that effective remediation has occurred, and risks are mitigated.

Roles and Responsibilities:

The Senior Management Team are jointly responsible for overseeing the implementation and adherence to this SLA. Key personnel will receive ongoing specialised training on modern slavery response protocols.

Monitoring and Review:

The effectiveness of this SLA will be continuously monitored through key performance indicators (KPIs) such as average response times, number of incidents remediated, victim support outcomes. This policy, including the SLA, will be formally reviewed annually by the Senior Management Team and published in our annual Modern Slavery Policy, demonstrating our ongoing commitment to transparency and improvement.

Communication And Awareness Of This Policy

Appropriate training on this policy, and on the risk to Energys Group business faced from modern slavery in its supply chains will be provided as necessary to targeted staff.

Energys Group's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

Breaches Of This Policy

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

Energys Group may terminate its relationship with other individuals and organizations working on its behalf if they breach this policy.



Signed: **Date: 1st November 2026**

Kevin Cox
Managing Director
On behalf of Energys Group