

SUSTAINABLE ADVANTAGE - MODERN-SLAVERY POLICY

Aims of this policy

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants, volunteers/interns and any other third-party representative.

We always expect all who have or seek to have a business relationship with the company to familiarise themselves with this policy and to act in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy (or those who are taking verifiable steps towards compliance).

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

Company Description

One of the UK's leading energy, multi utility and waste consultants, we're proud to be helping our customers reduce costs through innovative energy, utility and waste management solutions and boost their environmental credentials.

As well as our trading desk procuring energy contracts and renewals effectively by taking advantage of market changes, we monitor consumption to identify areas where energy use can be reduced, providing alarm alerts and insightful energy dashboards in our self-service portal. We manage and accelerate the delivery of utility infrastructure connections and metering which speeds up the opening of new premises and often at a lower cost.

Our waste division find eco-friendly disposal methods for everything from food to clinical waste, with an ultimate goal of both reducing costs and increasing recycling levels. We offer a full account management service, provide a UK helpdesk, compliance portal and reporting.

Many of our clients' businesses operate from multiple sites in sectors such as education, healthcare, hospitality, construction and manufacturing and have a total of more than 5,000 sites we support.

What do we mean by modern slavery?

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

- Slavery: where ownership is exercised over an individual
- Servitude: involves the obligation to provide service imposed by coercion
- Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
- Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

Other forms of modern slavery, which we will not tolerate, but are not specifically referenced in the MSA include, but are not limited to:

Child labour: whilst not always illegal in the jurisdiction in which it takes place, child labour involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

How we seek to embed our anti-slavery policy in practice

Sustainable Advantage expects that its suppliers will conduct their business in a lawful manner and in compliance with high standards of integrity and ethics. In order to establish guidelines for such standards, Sustainable Advantage expects all partners abide by a professional and ethical code of conduct. Sustainable Advantage requires supplier compliance with important legal; ethical, behavioural and other requirements specifically, Sustainable Advantage communicates to all suppliers that they must not support, promote or engage in the practice of slavery or human trafficking, and we require suppliers to comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

If Suppliers or Sub Contractors are found to be in violation of the law then Sustainable Advantage will take corrective action to address any deficiencies/ violations identified, Sustainable Advantage reserve the right to terminate its relationship with any supplier for failure to comply with the anti-slavery law.

While as a company we do not perform routine audits of our suppliers if noticed that a supplier is involved in these activities, we will conduct an inquiry, or third-party audit if warranted and take appropriate action as required in law.

All Reports for alleged violations will be investigated by Sustainable Advantage. Disregard or deliberate ignorance of the law failure to report known potential violations and or failure to cooperate in an investigation will not be tolerated and may lead to disciplinary action, including termination of employment.

Responsibility for this policy

The Management team has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The compliance officer, for Sustainable Advantage this is our Managing Director, who will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All Line Managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

Communication and employee awareness training

The Directors will ensure that all relevant employees receive adequate training on this policy and any supporting processes applicable to their role. Such training will form an integral part of the Company's induction processes.

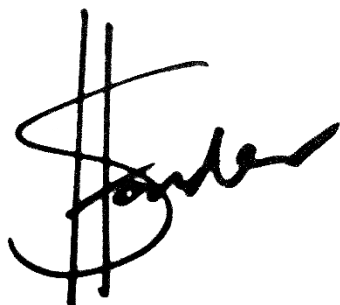
In addition, relevant employees will receive training on the broader issues of modern slavery to assist them in appreciating the extent of the problem of modern slavery and then identify individuals/areas of the business that may be at risk from practices of modern slavery.

Status of this policy

This anti-slavery policy will be reviewed by the Company's Management team on a regular (annual) basis.

This policy does not give contractual rights to company employees and we reserve the right to alter any of its terms at any time. We will notify applicable parties in writing of any changes which may affect them.

Signed



James Stander
1 January 2026