



## Modern Slavery Policy

Policy No: CE-GOV-PO-0010

Issue No. 1

Document Owner: Head of Governance

Date of Issue: 31st May 2022

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### 1 Document Purpose and Ownership

1.1 This policy lays out the expectation for our business for Modern Slavery and is a core business compliance concern. Below this policy are developing strategies and approaches to enable delivery and compliance with this Policy. It is applicable across our business.

1.2 Ownership of this policy is the responsibility of the Britishvolt Governance department.

### 2 Responsibilities

2.1 Overall responsibility for ensuring this policy complies with our legal obligations lies with Britishvolt's board of directors. The board of directors are also responsible for ensuring all those under its control comply with the policy.

The Chief Governance Officer 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.

Management at all levels of Britishvolt are 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.

### 3 Policy

#### 3.1 Policy Statement

3.1.1 Power by Britishvolt (**Britishvolt**) recognises that modern slavery is a crime and a violation of fundamental human rights. There are many types of modern slavery. These include forced and compulsory labour, slavery, servitude 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.

3.1.2 Britishvolt has zero-tolerance approach to modern slavery. 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. This commitment includes ensuring there is transparency across our own business and in our approach to tackling modern slavery throughout our supply chains and we have made a voluntary modern slavery statement in line with the Modern Slavery Act 2015.

3.1.3 Britishvolt expects our contractors, suppliers and other business partners to take the same approach to modern slavery and as part of our contracting process, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.



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- 3.1.4 This modern slavery 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.

### 3.2 Compliance with this policy

- 3.2.1 Britishvolt will not tolerate parties engaging in or condoning the use of slavery. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Britishvolt may terminate its relationship with other individuals and organisations working on Britishvolt's behalf if they breach this policy.
- 3.2.2 All staff must read, understand and comply with this policy and are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.2.3 If you have reason to believe or suspect that a breach of this policy has occurred or may occur, you must notify your manager and/or the Chief Governance Officer or, if you prefer, contact:
- [www.safecall.co.uk/report](http://www.safecall.co.uk/report) or dial 0800 915 1571 in the UK or on the internet via [www.safecall.co.uk/freephone](http://www.safecall.co.uk/freephone) to identify numbers for other parts of the world.
- 3.2.4 It is Britishvolt's aim to encourage openness and will support anyone who raises genuine concerns under good faith under this policy, even if they turn out to be mistaken.

### 3.3 Communication of this policy

- 3.3.1 Training on this policy and on the risk our business faces from modern day slavery in its supply chains, forms part of our ongoing training support and the induction process for all individuals who work for us. Regular training will be provided as necessary.
- 3.3.2 Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the beginning of our business relationship with them.

Tom Cowling  
Chief Governance Officer  
31 May 2022



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### 4 Related Documentation

Doc. Number	Description
CE-GOV-OD-0001	Modern Slavery Statement

### 5 Revision History

Description of change	Changed by	Position
First issue as controlled document	Craig Woodburn	Head of ESG