

Ethical Sourcing Policy

Approved by	Paul Hamilton, Director
Effective date	30 September 2026
Review date	30 September 2027
Version	1.0

1. Policy statement

Hamilton Energi Ltd is committed to sourcing goods and services lawfully, responsibly and with respect for people, communities and the environment. We expect the same standards from suppliers, subcontractors, labour providers and other business partners. Ethical considerations will be integrated into supplier selection, contracting, performance management and purchasing decisions.

We will take a risk-based and proportionate approach to due diligence, prioritising the most serious and likely adverse impacts. Where harm is identified, we will seek effective remediation and continuous improvement. We will not knowingly benefit from modern slavery, child labour, unsafe work, discrimination, corruption, sanctions evasion, illegal environmental damage or other serious misconduct.

2. Purpose and scope

This policy establishes the minimum ethical sourcing requirements for all purchases made by or on behalf of Hamilton Energi Ltd. It applies to all employees involved in specifying, selecting, approving, ordering or managing suppliers, and to all suppliers and their supply chains, proportionate to risk and influence.

Suppliers must comply with applicable laws in every country in which they operate and meet this policy where it sets a higher standard, unless doing so would conflict with local law. Contract-specific or customer requirements may impose additional controls.

3. Legal and recognised framework

This policy supports compliance with applicable UK legislation and guidance, including the Modern Slavery Act 2015, Bribery Act 2010, Equality Act 2010, Employment Rights Act 1996, National Minimum Wage Act 1998, Health and Safety at Work etc. Act 1974, Criminal Finances Act 2017, sanctions legislation made under the Sanctions and Anti-Money Laundering Act 2018, and relevant environmental, product, data protection and competition law.

Our approach is informed by the UN Guiding Principles on Business and Human Rights, the International Labour Organization's fundamental principles and rights at work, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

4. Minimum supplier standards

4.1 Human rights and labour

- No slavery, servitude, forced or compulsory labour, human trafficking, debt bondage or unlawful recruitment fees.
- No child labour. Suppliers must meet applicable minimum-age laws and must not allow hazardous work by anyone under 18.
- Employment must be freely chosen. Workers must receive clear, understandable terms and may leave employment subject to lawful notice.
- Wages, benefits, working hours, rest periods, holiday and overtime must meet applicable law and binding agreements. Wage deductions must not be used as punishment.
- Workers must be treated with dignity and without harassment, abuse, retaliation or unlawful discrimination. Freedom of association and lawful collective bargaining must be respected.
- Recruitment agencies and labour providers must be properly licensed where required, responsibly managed and subject to equivalent standards.

4.2 Health, safety and welfare

- Provide safe and healthy workplaces, suitable welfare facilities, competent supervision, appropriate training and necessary personal protective equipment without improper charge to workers.
- Assess and control occupational risks, including emergency arrangements, machinery, chemicals, fire, transport, accommodation and work-related ill health.
- Report, investigate and learn from incidents, and allow workers to raise or remove themselves from serious and imminent danger without retaliation.

4.3 Business integrity

- Prohibit bribery, facilitation payments, fraud, tax evasion facilitation, money laundering, conflicts of interest and improper gifts or hospitality.
- Maintain accurate records and disclose ownership, origin, agents and subcontractors when reasonably requested.
- Comply with applicable trade controls, sanctions, competition, confidentiality, intellectual property and data protection requirements.
- Do not engage in unauthorised subcontracting, product substitution, falsification or concealment.

4.4 Environment and responsible materials

- Comply with environmental law and permits and take proportionate steps to prevent pollution, reduce greenhouse-gas emissions, energy, water and waste, and protect biodiversity.
- Apply responsible sourcing controls to timber, minerals and forest-risk or conflict-affected commodities, including traceability and recognised certification where specified.
- Provide accurate environmental and product information and avoid misleading claims.

5. Risk-based due diligence

Before appointment and throughout the relationship, Hamilton Energi Ltd will apply controls proportionate to factors such as country, sector, commodity, workforce model, subcontracting, spend, criticality, adverse media and previous performance.

1. **Screen:** Confirm identity, ownership, capability, conflicts, sanctions exposure and acceptance of this policy.
2. **Assess:** Use questionnaires, documentary checks, worker or stakeholder engagement, site visits or independent audits where risk warrants them.
3. **Contract:** Include relevant standards, information rights, audit rights, flow-down obligations, notification duties and remedies.
4. **Monitor:** Review performance, incidents, grievances, corrective actions and material changes at a frequency based on risk.
5. **Escalate:** Refer high-risk, disputed or unresolved matters to Paul Hamilton, Director, who will obtain specialist advice where appropriate.

Suppliers must promptly notify Hamilton Energi Ltd of any actual or suspected serious breach, regulatory action, sanctions designation, loss of a required licence, or major change in ownership, sourcing location or subcontracting that may affect compliance.

6. Modern slavery response and remediation

Concerns will be assessed promptly, confidentially and with regard to the safety and wishes of affected people. Where practicable, Hamilton Energi Ltd will work with the supplier and competent organisations on a time-bound corrective action plan rather than terminate automatically where doing so could increase harm.

Remediation may include protecting workers, repaying recruitment fees or withheld wages, correcting unsafe conditions, changing recruitment practices, providing access to remedy and preventing recurrence. Credible evidence of deliberate, repeated or unremedied serious misconduct may result in suspension, termination, exclusion from future work, reporting to authorities or other lawful action.

7. Speak up and grievance channels

Employees, workers, suppliers and other stakeholders are encouraged to report concerns through Paul Hamilton, Director, at customers@hamiltonenergi.com. Reports may be made anonymously where permitted. Hamilton Energi Ltd prohibits retaliation against anyone raising a concern in good faith or participating in an investigation.

Immediate danger or suspected crime should be reported to the appropriate emergency service or authority. Modern slavery concerns may also be raised with the UK Modern Slavery & Exploitation Helpline. Nothing in this policy prevents lawful whistleblowing or reporting to a regulator or law-enforcement body.

8. Roles and responsibilities

- Paul Hamilton, Director: Approves this policy and oversees material ethical sourcing risks.
- **Policy owner:** Maintains the framework, advises the business and reports significant issues and trends.
- **Procurement and contract managers:** Apply due diligence, include requirements in contracts, maintain records and monitor corrective actions.
- Paul Hamilton, Director: Arranges specialist health and safety, legal, HR and finance advice where required.
- **Employees:** Follow procurement controls, avoid conflicts, complete required training and report concerns.
- **Suppliers:** Implement equivalent controls, communicate requirements to workers and relevant sub-tier suppliers, retain evidence and cooperate with proportionate assurance activity.

9. Training, records and reporting

Relevant employees will receive training appropriate to their responsibilities and risk exposure. Due diligence, approvals, contracts, assessments, audits, grievances and corrective actions will be documented and retained in accordance with legal and company requirements.

Performance may be measured using risk coverage, supplier participation, training completion, audit findings, overdue corrective actions, worker concerns, remediation outcomes and repeat breaches. Where applicable, Hamilton Energi Ltd will support accurate statutory and customer reporting, including its annual modern slavery statement.

10. Compliance and review

Compliance with this policy is a condition of doing business with Hamilton Energi Ltd. Requirements will be applied fairly and proportionately, with support for smaller suppliers where appropriate, but without lowering standards relating to serious harm or illegality.

This policy will be reviewed at least annually and sooner after material legal, risk, organisational or operational change. Exceptions require documented approval from Paul Hamilton, Director and must not permit unlawful conduct or compromise fundamental human rights.

Approved by: Paul Hamilton

Role: Director

Date: 30 September 2026