

Anti-slavery and human trafficking policy and compliance plan

This Energy Market and Regulatory Consultants Limited (EMRC) Policy is approved by the EMRC Board. It represents the EMRC Board's direction to the business on this topic.

Compliance with this policy is mandatory. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, associates, contractors and suppliers.

1 Policy statement

EMRC strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

2 Compliance plan

2.1 Modern slavery and human trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

Modern slavery is a crime and a violation of fundamental human rights.

2.2 Commitments for all employees and subcontractors

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery and human trafficking:

- We have a zero-tolerance approach to modern slavery and human trafficking in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery and human trafficking in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery and human trafficking in our operations and supply chain.
- Our recruitment process only permits the use of recruitment companies with trained employees, prohibits charging recruitment fees to the employee, and ensures that wages meet applicable host-country legal requirements or explains any variance.
- Where we provide or arrange housing for our employees, we will ensure that the housing meets host-country housing and safety standards.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with this policy, which sets out the minimum standards required to combat modern slavery and human trafficking.
- As part of our ongoing risk assessment and due diligence processes we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with this policy.
- Any employee who breaches this policy will face disciplinary action, which could result in termination of employment with EMRC for misconduct or gross misconduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether that might represent the best outcome for those individuals impacted by the breach to terminating such relationship. Factors that will guide the appropriate action to take in a given situation will depend on EMRC's control or influence over the entity

concerned, the severity of the abuse, the safest outcome for the potential victims, and whether terminating the relationship with the entity itself would have adverse human rights consequences.

3 Reporting requirements

All EMRC employees at all levels, including directors, officers, associates, contractors and suppliers are required to report any suspected trafficking-related activity or violation of this policy to any director or HR representative.

HR will investigate all reports of any prohibited trafficking-related activity or violations of this policy and take appropriate action.

Our employees are also made aware of the ability to report any activity inconsistent with this policy via the hotline phone number of the Global Human Trafficking Hotline (USA) 1-844-888-FREE and its email address at help@befree.org.

4 Awareness

Awareness of this policy is raised in the following ways:

- This policy is shared with all employees;
- Familiarity with this policy is part of our new starter process;
- Compliance with this policy forms part of our subcontractor and associate agreements;
- A copy of this policy is made available in all our offices; and
- A copy of this policy is made available on our website.

Approved by: EMRC Board

Date: 19 November 2018