

 SHORTWOOD SOLUTIONS LTD.	<i>ETHICS POLICY</i>	SS-ETH-01	
		Version: 1	15/04/2024
		Audit due: 15/04/2025	Pages: 7

Shortwood Solutions Limited

Ethics Policy

SS-ETH-01

Prepared by:	Approved by:
Kathleen Lee Director	Oliver Lee Director
Distribution: To be communicated with all employees regardless of the nature of their contract, and sub-contractors, affiliates, and stakeholders	

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Ethics Policy

Shortwood Solutions Limited is committed to achieving and maintaining exemplary business behaviour within all aspects of our service delivery and will base all business interactions and transactions on a firm ethical foundation. All directors and employees should be aware of their ethical obligations; it is their collective responsibility to ensure that they are fully familiar with this document and use it as a foundation for their working practices and interactions with all stakeholders of Shortwood Solutions. The purpose of this policy is to facilitate a culture of honesty, transparency, and integrity in relation to all company practices and ensure that all stakeholders involved with Shortwood Solutions are protected from illegalities and/ or actions that could lead to damage regardless of whether such actions are undertaken knowingly or unknowingly.

Equality, Diversity, and Inclusion

Shortwood Solutions Limited has a separate policy for Equality, within which the company demonstrates its commitment to understanding differences and non-discriminatory practice. Equal opportunities and workplace equality are concepts embedded within the company's core ethos.

Social and Economic Benefits

Shortwood Solutions Limited believes in creating the right workplace culture. It has developed a strong reputation within the renewables industry, which implies the subsequent ability to attract, retain, collaborate with, and maintain positive relationships with all stakeholders. Shortwood Solutions Limited demonstrates a commitment to a zero-tolerance policy concerning discrimination based on any protected characteristic both internally as an organisation or with any organisation it works with externally, as detailed in the Equality Policy.

Anti-Slavery and Human Trafficking

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 to exploit them for personal or commercial gain.

Shortwood Solutions Limited has a zero-tolerance approach to modern slavery, and 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. We are also committed to ensuring transparency in our business and approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

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We expect the same high standards from all our contractors, suppliers, and other business partners. In the coming year, we will include specific prohibitions against the use of forced, compulsory, or trafficked labour or anyone held in slavery or servitude, whether adults or children, as part of our contracting processes. We also expect that our suppliers will hold their own suppliers to the same high standards.

This 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.

This policy is not part of any employee’s employment contract, and we may amend it anytime.

The Company is responsible for ensuring this policy complies with our legal and ethical obligations and that all those under our control comply with it. The Company is responsible 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 effectively counter modern slavery.

Management at all levels is 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.

It is the director’s and employee’s collective responsibility to read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to or suggest a breach of this policy. You must notify your line manager OR a company Director as soon as possible if you believe or suspect a conflict with this policy has occurred or may occur. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify the company Director as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will support and guide our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they are mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

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Code of Conduct

Forced or involuntary labour

Any Director or employee of Shortwood Solutions Limited is free to terminate their Directorship/ employment at any time, without penalty, in line with their contractual terms. Any employee of Shortwood Solutions Limited will not be subject to forced, compulsory, debt-bonded or indentured labour.

Recruitment fees and deposits

Shortwood Solutions Limited will never charge any fees or costs for recruitment, inclusive of travel, document processing or work visas (at home and abroad). Shortwood Solutions Limited will never ask for any form of security deposit.

Contracts of employment

Shortwood Solutions Limited will supply all employees with contracts in a language that they understand, with all terms and conditions of employment and employee rights and responsibilities clearly stated. Supplemental agreements and contractual substitution (for less favourable terms) is prohibited.

Document retention.

Shortwood Solutions Limited will not confiscate any worker identity or other valuable documents and the use of documentation to bind a person to a workplace is prohibited.

Humane treatment

Shortwood Solutions Limited is a workplace free of harsh and inhumane treatment of any form. All policies and procedures are communicated to all directors and employees wherein expectations of personal and professional conduct are clearly stated. Disciplinary policies and procedures are benchmarked against national standards within the UK and will never include any inhumane measures such as corporal punishment, coercion of any form, verbal or physical abuse or punitive measures involving financial/ wage/ benefit sanctions.

Freedom of movement and personal freedom

Employees and directors working with Shortwood Solutions Limited will not have their freedom of movement or personal freedom unreasonably restricted by any form of coercive means.

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Grievances

Shortwood Solutions Limited has a separate grievance procedure which facilitates grievance submission for any employee, and protection for the reporter from retaliation and prejudice.

Anti-bribery and corruption

Shortwood Solutions Limited is committed to conducting business in an ethical manner, and to undertaking all business interactions with honesty, integrity, and transparency. Shortwood Solutions Limited has a zero-tolerance policy for bribery and acts of corruption. Shortwood Solutions Limited will implement and enforce systems that protects all stakeholders from corruption and bribery and will act in compliance with legislations in the jurisdictions within which they are operational and are bound by the laws of the Bribery Act (2010). This legislation will guide the conduct of Shortwood Solutions Limited both in the UK and abroad.

Bribery can be summarised as the following:

“Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company’s compliance manager.” (from https://www.cistermiser.co.uk/wp-content/uploads/2019/02/anti_bribery_corruption_policy.pdf viewed 15/04/2024)

Shortwood Solutions Limited will ensure all employees and directors are aware of the risks associated with bribery and corrupt acts, and will promote vigilance, and reporting of any such acts through appropriate channels.

You can be held personally liable for any such offence. It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business. It is also an offence for companies to fail to prevent bribery by ‘associated persons’, which is inclusive of employees or any other persons performing services on behalf of the organisation, and senior officers of the organisation will be held liable.

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All employees and associated persons are required to:

- 1) Comply with all anti-bribery and anti-corruption legislation.
- 2) Act honestly, responsibly and with integrity; and
- 3) Safeguard and uphold our core values by operating in an ethical, professional, and lawful manner.
- 4) Be vigilant and report any suspicions of bribery and/or corrupt activities to the Director. Confidentiality will be maintained insofar as is possible for the purposes of investigative procedures. Any deviation from the company's anti-bribery and corruption policies will be dealt with as per the disciplinary procedure. Dependent upon the gravity of the offence, subsequent sanctions may include escalation to gross misconduct, termination of contract of employment / employment or associative agreement with Shortwood Solutions Limited, and /or legal proceedings being commenced.
- 5) Maintain adequate records of income/ expenditure / accounts with strict accuracy, transparency and with evidence of an audit trail.

This policy will be audited annually to ensure compliance with best evidence-based practice and will be held by the Director of the Shortwood Solutions Limited company.

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DOCUMENT REVISION

Date	Revision	Prepared by	Agreed by
15.04.2023	1	Kathleen Lee (Director)	Oliver Lee (Director)