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## Modern Slavery and Human Trafficking Statement

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### 1. Introduction

- a. From the beginning of 2023 we have enhanced our Modern Slavery and Human Trafficking Statement to include improved due diligence for future and new suppliers which will strengthen our procurement procedures.
- b. This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 01 January 2023 to 31 December 2023.
- c. The statement sets down Vantage RE Limited (“Vantage”) commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.
- d. We all have a duty to be alert to risks, however small. We encourage all employees, customers, and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.
- e. Our company ethos encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating on site and managing our supply chain.

### 2. Organisational structure and supply chains

- a. This statement covers the business activities of Vantage which are associated with the acquisition and management of Renewable Energy Generating assets.
- b. Within our current portfolio and the future assets that we seek to acquire, Vantage believe the risk of encountering modern slavery or trafficking through our own operation or those of our suppliers is low.
- c. We recruit talented individuals and pay them fairly and treat them with respect, we also ensure that our suppliers and partners do the same. Our core values of integrity, collaboration, professionalism, forward thinking and mindfulness set the standard by which we operate.
- d. The Company currently operates in the United Kingdom.
- e. Responsibility for the Company’s anti-slavery initiatives is as follows:
  - **Policies:** The Chief Business Services Officer is responsible for creating and reviewing policies. The process by which policies are developed is applying best practice and adapting to the needs of the Company.
  - **Risk assessments:** Managers are responsible for conducting risk assessments in respect of human rights and modern slavery.

- **Due Diligence:** The Procurement function under the Chief Business Services Officer is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.
- 3. Supplier Due Diligence**
- a. Vantage undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. We make clear our expectations on modern slavery and human trafficking. Our due diligence includes:-
- Assessing risks in the provision of particular services including reviewing their health and safety standards, and labour relations;
  - Requiring improvements to substandard employment practices;
- b. Furthermore, we require all suppliers to attest and provide evidence that:
- They do not use any form of forced, compulsory or slave labour;
  - They do not use any child labour;
  - They provide equality of opportunity and treatment regardless of an employee's characteristics e.g. gender, race, religion, age, sexual orientation, disability;
  - They follow all relevant employment standards, practices, and law to the geography in which they operate in e.g. Minimum wage, Equal pay, Working time regulations, Maternity protection;
  - They have fair and appropriate recruitment and promotion practices;
  - They provide relevant education and training for their employees;
  - They protect employees from sickness, disease and injury arising from their employment;
  - They enable freedom of association e.g. to join a trade union;
  - They enable and support inspection of their labour practices from relevant labour inspectors e.g. Health and Safety Executive, HMT Inspectors;
  - Their employees have a "voice" and are able to raise concerns about their work e.g. from grievance processes;
  - Their employees work voluntarily and are entitled to leave work;
  - They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment;
  - They do not require employees to post a deposit/bond and don't withhold their salaries for any reasons;
  - They do not require employees to surrender their passports or work permits as a condition of employment.
  - They have KPIs in place to monitor progress against managing modern slavery risks;
  - They comply with any relevant UK or Malaysian International Sanctions as listed on respective government websites.
  - They do not work with companies or named individuals who are subject to UK or Malaysian International Sanctions and as listed on respective government websites.
- c. Suppliers will also be required to;
- Regularly report on modern slavery risks, even if the report is zero risks;
  - Undertake any relevant and regular site visits / audits to monitor modern slavery risks;
  - Have established clear and unambiguous processes for reporting and responding to suspected incidents of modern slavery;
  - Have a contingency plan in place to ensure continued safe service delivery if modern slavery risks are identified or cases of modern slavery have been reported.

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- d. Vantage will take action against suppliers who during the period of their contract fall below the standards expected or who that fail to improve their performance in line with an action plan provided by us. This may include the termination of the business relationship.

#### 4. Training

- a. To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, Vantage requires all staff to complete Vantage's modern slavery training as part of the induction process. The training includes:
- The definition of Modern Slavery
  - An explanation of who is most affected
  - Examples of Modern Slavery
  - The role of business in preventing modern slavery.
  - The signs of slavery and what you should do if you spot them.

#### 5. Policies

- a. Vantage is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This statement affirms Vantage intention to act ethically in our business relationships. Vantage complies with the UK's Modern Slavery Act 2015, which ensures alignment with all relevant International Standards on Human Rights.
- b. The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:
- **Whistleblowing policy:** Vantage encourages all its workers, customers, and other business partners to report any concerns related to its direct activities or its supply chains.
  - **Vantage Employee Handbook, and Anti-Bribery, Ethics, & Conflict of Interests Policies:** sets down the actions and behaviour expected of employees when representing the Company.
  - **CSR policy:** Vantage is a wholly owned subsidiary of Tenaga Nasional Berhad (TNB) and TNB's policy on CSR can be found via the following link [Sustainability Report - Tenaga Nasional Berhad \(tnb.com.my\)](https://www.tnb.com.my/Sustainability-Report)

#### 6. Performance Indicators

- a. The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains.
- An anti-slavery advocate at ExCom Level to help oversee the implementation of this Statement and increase awareness of any actions that need to be taken;
  - Require all new Suppliers to complete the Vantage Modern Slavery Assessment Tool annually to demonstrate all requirements as set out in section 3 above.
  - Annually review, and where relevant amend our procurement policies and practices where they fall below The UK's Modern Slavery Act 2015;
  - Review, at least every 3 years our People Practices and Policies, and where relevant amend our people policies and practices where they fall below The UK's Modern Slavery Act 2015;
  - Vantage will undertake an annual review of any Modern Slavery and Human Trafficking risks;
  - All Staff complete annual e-learning refresher on Modern Slavery.

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**7. Review of this policy**

- a. This Modern Slavery and Human Trafficking Statement will be reviewed annually from the date of this policy. The latest date that this policy will be reviewed is 1 January 2024.

This policy has been approved & authorised by:

Name:	Vian Davys
Position:	Chief Executive Officer
Date:	18 <sup>th</sup> January 2023
Signature:	