

Octopus Energy Generation Supplier Code of Conduct

February 2024

Octopus Energy Generation (“OEGEN”) is a trading name of Octopus Renewables Limited (“ORL”), which is authorised and regulated by the Financial Conduct Authority under Firm Reference Number 473797. ORL is a wholly owned subsidiary of Octopus Energy Group Limited (“OEG”) and is part of the Octopus Energy Generation business within OEG.

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DOCUMENT CONTROL

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2.0	04/08/2022	Octopus Energy Generation Supplier Code of Conduct		LH	LH
3.0	10/12/23	Octopus Energy Generation Supplier Code of Conduct	Approved 22/02/24	MS/LH	LH

Frequency of Review

The Octopus Energy Generation Supplier Code of Conduct (Code) should be updated whenever there are material updates to any legislation or practices contained in the Code but in no case less frequently than on annual basis.

Supplier Code of Conduct

Foreword

OEGEN has a core mission to accelerate the transition to a future powered by renewable energy. OEGEN wants to change the world for the better and strives to do business the "right" way. For OEGEN this means engaging with suppliers and building a culture where people 'do the right thing, even when no one is watching'. OEGEN maintains a zero-tolerance approach to human rights violations, environmental degradation, bribery, and corruption.

In accordance with OEGEN's core values, OEGEN requires its direct suppliers, contractors, and business partners ("Suppliers"), to conduct their business responsibly. For OEGEN, it is important that all activities and business conducted in OEGEN's supply chain seek to be in line with this Supplier Code of Conduct at a minimum.

The requirements in this code are set based on the UN Global Compact, the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Suppliers that provide products or services to OEGEN shall comply with all laws and regulations applicable to their business's geographical boundaries. This includes those respecting individuals' human rights, and mindful of environmental and safety impacts of products and services. When differences arise between standards set out in this Supplier Code of Conduct and legal or regulatory requirements, the stricter standard applies, in compliance with applicable law or regulation. OEGEN also encourages that the Supplier shall require its own suppliers ("Sub-suppliers") to comply with this Supplier Code of Conduct or to explain why its Sub-suppliers are not in compliance. If a Supplier doesn't require its Sub-suppliers to comply with OEGEN's Supplier Code of Conduct, then they should be able to demonstrate that their own Supplier Code of Conduct is as robust as OEGEN's. This Supplier Code of Conduct shall apply to all the Suppliers' operations, including manufacturing, delivery, sales, and support. This is applicable to all Suppliers and Sub-suppliers of a material nature.

It is expected that all of OEGEN's Suppliers will return the Supplier Code of Conduct declaration of compliance, detailing which sections, if any, the Supplier is not compliant with. It is expected that compliance with the Supplier Code of Conduct will be included in any new contractual obligations. This may require the Supplier to be able to provide specific documents confirming the Supplier's own status in matters relating to responsible operations and also to provide information about which companies are OEGEN's Sub-suppliers in relation to the Supplier.

OEGEN commit to carrying out periodic supplier reviews for material and on-going supplier partnerships to confirm continued compliance to the Supplier Code of Conduct.

Supplier Code of Conduct sections

1. Respect for Human Rights

Suppliers shall recognise and respect international human rights standards in accordance with the UN Guiding Principles on Business and Human Rights, UN Universal Declaration of Human Rights and the International Labour Organisation's (ILO) International Labour Standards. Suppliers shall avoid directly causing or contributing to adverse human rights impacts throughout their operations and their own supply chains and, where possible, seek to prevent or mitigate adverse human rights impacts linked to [our companies] through its business relationships.

2. Non-discrimination

Suppliers shall promote fair treatment of all employees, without discrimination on grounds of race, gender, nationality, disability, political or religious beliefs..

Suppliers shall also promote that employees with the same qualifications, experience and performance receive equal pay for equal work compared to others who perform the same work under similar working conditions.

3. Child labour

Suppliers shall not employ workers under the age of 15 or child labour as defined by the International Labour Organisation conventions, nor benefit from the use of child labour, and not employ young persons under the age of 18 for hazardous work. Suppliers are expected to consider their own upstream suppliers standards in relation to child labour to minimise the risk of this occurring in their own supply chain.

4. Forced or Compulsory labour

Suppliers shall prohibit forced or compulsory labour and ensure employees are free to terminate their employment after the agreed period of notice, in accordance with national law or contract. As an employer, Suppliers shall not require employees to deposit money or identity documents with them in order to gain employment. Suppliers are expected to consider their own upstream suppliers standards in relation to forced and compulsory labour to minimise the risk of this occurring in their own supply chain.

5. Minimum wage and benefits

Suppliers shall:

- comply with all applicable wage and hour laws and regulations, including those relating to minimum wage, overtime, and other elements of compensation, and must provide all legally mandated benefits;
- strive to pay workers the living wage, and as a minimum paying worker the minimum legal wage or a wage that meets local industry standards, whichever is greater;
- compensate workers for overtime hours at the legal premium rate;

- communicate pay structure and pay periods to all workers;
- pay accurate wages in a timely manner;
- Not permit any unlawful, unauthorised, or disciplinary salary deductions.

6. Working hours

Suppliers shall maintain work hours in compliance with applicable national legislation and industry standards regarding working hours and public holidays. Suppliers shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

7. Occupational Health and safety

In compliance with applicable laws and regulations, Suppliers shall ensure their employees' occupational safety and health through the provision of safe working conditions that do not jeopardise their physical, mental or emotional wellbeing. All hazards and the resulting health risks encountered by the employees must be properly assessed, and necessary safeguard measures must be taken.

8. Freedom of association and the right to collective bargaining

Suppliers shall respect their employees' freedom of association and right to collective bargaining as stated in current applicable laws and the ILO conventions.

9. Rights of indigenous people

Suppliers shall respect the rights of indigenous and tribal peoples and their social, cultural, environmental, and economic interests, including their connection with lands and other natural resources. Suppliers should follow the principles of free, prior, and informed consent, and participation to obtain broad-based consent of indigenous and tribal peoples in their activities.

10. Anti-corruption

Suppliers shall adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

11. Environment

Suppliers shall identify and meet all relevant environmental legislative and regulatory requirements, maintain all applicable licenses, registrations, and permits, and work according to an environmental management system delivering resource efficiency, as well as emergency response preparedness.

Suppliers shall manage and disclose the use of hazardous materials in own operations and find environmentally friendly substitutes when feasible, establishing control mechanisms for preventing pollution from hazardous substances, waste and effluents, and air emissions. Suppliers shall reduce any waste caused by own operations and reuse or recycle whatever is technically feasible.

Suppliers shall evaluate the environmental performance of their activities, minimise environmental impact, and make continuous improvements in environmental protection.

If applicable, Suppliers shall develop and implement an environmental policy.

12. Conflict Minerals

Suppliers of tin, tungsten, tantalum, gold, and other conflict minerals shall make a reliable determination of the origin and source of such minerals. In the case these minerals are produced in, or sourced from, conflict-affected areas. Suppliers shall perform enhanced due diligence to avoid contamination of supply chain by conflict minerals by applying the due diligence procedures in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, if relevant.

Declaration of Compliance

I declare that to the best of my knowledge **[Insert name of your Organisation]** is **fully compliant** with the Octopus Energy Generation Supplier Code of Conduct (version 2).

	Declaration of Compliance completed by:
Name	
Role in organisation	
Date	
Signature	

Or

I declare that to the best of my knowledge **[Insert name of your Organisation]** is **partially** with the Octopus Energy Generation Supplier Code of Conduct (version 2).

	Declaration of Compliance completed by:
Name	
Role in organisation	
Sections the Organisation is currently not compliant with	
Date	
Signature	