

Ethical Trading, Anti-bribery and Anti-corruption Policy

It is the policy of **The Renewables Consulting Group Limited** (“RCG”) to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any contractor who breaches this policy may have their contract terminated with immediate effect.

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.

We will only engage with clients and suppliers that operate in an honest and fair manner, similar to the high standards we set internally. Additionally, we will engage a reputable accounting or legal firm to carry out integrity due diligence on prospective clients, suppliers or other counterparties where there is any reason to suspect a higher than normal risk during our pre-contract risk assessment processes.

RCG will only boycott trading with clients or suppliers when sanctions have been imposed by the United Kingdom, the United States, the European Union, or the United Nations that restrict or prohibit dealings with certain countries, entities or individuals. We will ensure that we know and follow applicable sanctions restrictions wherever we are conducting business. We will not engage in any agreements, provide information or take any action that would support any non-sanctioned boycotts. Any request by a client or supplier to participate in an illegal boycott must be immediately reported to the Chief Operating Officer.

A bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited.

Specifically, our staff and contractors must not:

- » give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- » accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- » give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- » threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Whilst our policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes, any gift or hospitality will not be appropriate if it could be seen as an

inducement or reward for any preferential treatment. Gifts must be given in the firm's name and the giving of such gifts must be transparent. Staff must declare and keep a written record of all hospitality or gifts given or received.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and clients must be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

RCG actively fosters a culture of continual improvement, open dialogue and consultation between Directors, employees, contractors and clients in the pursuit of the highest standards of business integrity.

RCG expects that contractors working with, and for, the company are competent, professional, and that they accept comparable anti-bribery and anti-corruption standards.

This policy shall be reviewed annually, and updated as necessary.

A handwritten signature in black ink, appearing to read 'Lee Clarke', written in a cursive style.

Dr Lee Clarke
Chief Operating Officer

22nd May 2019

For and on behalf of the Board of Directors