



Anti-Slavery & Human Trafficking Policy 2026

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1. Policy Statement

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 in order to exploit them for personal or commercial gain.

GreenTech Scotland has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships. We are equally committed 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.

2. Scope of Policy

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, sub-contractors, external consultants, third-party representatives, and business partners.

3. Supply Chain Due Diligence

Operating within the electrical, renewable energy, and fire safety sectors, GreenTech Scotland recognizes that our supply chains are global. The procurement of electronic components, Solar PV panels, LED lighting, and Battery Energy Storage Systems (BESS) carries inherent international supply chain risks.

To mitigate these risks and ensure ethical procurement, we mandate the following:

- **Supplier Vetting: We expect our primary manufacturers and Tier-1 wholesale partners (e.g., ROBUS, Thorn, and our Solar PV manufacturing partners) to hold robust, published Modern Slavery policies and to conduct their own downstream audits.**

- **Ethical Sourcing:** We actively avoid sourcing materials from regions with documented, state-sponsored forced labour or high risks of human trafficking, particularly concerning the extraction of raw materials for battery and solar technologies.
- **Sub-Contractor Audits:** Any sub-contracted labour utilized on GreenTech Scotland sites must be thoroughly vetted. We mandate proof of the Right to Work in the UK and do not permit the use of unverified umbrella companies that obscure employment practices.

4. Responsibility for the Policy

- The Managing Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- The Chief Operations Officer / Procurement Team has primary and day-to-day responsibility 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 are effective in countering modern slavery.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

5. Reporting and Whistleblowing

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.

Employees and sub-contractors are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage. GreenTech Scotland maintains a strict non-retaliation policy; we are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place.

6. Communication and Training

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for

us. Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Signed on behalf of GreenTech Scotland:

Jonathan William Travers

Managing Director

GreenTech Scotland

Date: 01/01/2026