

Atrato Onsite Energy Plc

Responsibility and Scope

Atrato Onsite Energy plc (“the Company” or “ROOF”) is an investment company focused on onsite clean energy generation. The Company focuses on UK commercial rooftop and onsite solar, helping its corporate clients achieve net zero and reduce their energy bills. As long-term investors the Company is fully committed to integrating sustainable practices into its operations and expects that its business partners should do the same.

The Company’s activities align with the UN Sustainable Development Goals (SDG) Agenda 2030, and we have identified the following SDGs as the most relevant to us:

- SDG 7 (Affordable & Clean Energy)
- SDG 12 (Responsible Consumption & Production)
- SDG 13 (Climate Action).

The Company is committed to upholding international human rights standards, ethical trading processes, and socially responsible business practices. We take a stance of non-negotiable ethics within our business, with an expectation that this viewpoint is upheld throughout our supply chain and that all suppliers will adhere to this policy. This policy outlines our commitment to following the United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, and UN Global Compact (UN GC). As full participants of the UN GC, we are committed to supporting the UN GC Ten Principles.

Responsibility

This policy forms part of the Company’s operational policies, and falls under the overall responsibility of the Company’s Board of Directors.

The Company requires that the Investment Adviser takes direct responsibility for ensuring effective implementation of this policy throughout all its investment processes, subsequent asset management and any relevant supply chain considerations.

The Company requires that annual progress reports are provided to the Board, outlining progress against the agreed Sustainability strategy. This is led by the Managing Director, ESG.

Scope

This policy requires all our third-party partners, suppliers, contractors and business partners to conduct themselves in a manner that is consistent with the requirements of this Policy as well as our Module Procurement Policy. The latter focuses on mitigating the risk of the Company supporting any forced labour through its procurement of solar modules specifically.

Policy

The Company will endeavour to take all reasonable steps to ensure that our products are sourced only from those suppliers who maintain satisfactory working conditions, pay a fair wage, comply with local labour and health & safety laws, and commit to the following principles;

- Employment is freely chosen and forced labour is prevented.
- Freedom of association and the right to collective bargaining are respected.
- Working conditions are safe and hygienic with access to potable water.
- Child labour is not to be used and children's rights are respected.
- Wages and other remuneration are paid in accordance with local employment legislation and employment markets, respecting national minimum wage and industry agreements where applicable. This supports the ability for workers to meet their basic living needs.
- Working hours are not excessive and comply with local labour law requirements.
- No discrimination is practised. For example, against race, religion, gender, age, sexual orientation, disability, or nationality.
- No harassment or abusive behaviour is allowed including harsh or inhumane treatment or physical disciplinary action.
- All workers have access to fair grievance procedures and remedies.

Monitoring and Reporting:

The Company will work with our suppliers to monitor and report on human rights within our supply chains; conducting risk assessments of potential suppliers and where appropriate requesting third-party social compliance audits to the SMETA or BSCI standard, or an agreed equivalent. In due course and where financially feasible the Company will look into adopting a supply chain platform technology, such as SEDEX, to link suppliers digitally.

This policy and its associated guidance will be reviewed periodically and amended as necessary.

Signed by:

Juliet davenport
Chair

11th December 2023