

Working together for a
cleaner energy future



Social Commitment Policy

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Management Summary

In accordance with our general business principles, MarramWind Ltd (the “Company”) commits to respecting the human rights recognised in domestic and international legislation for our employees, stakeholders and obliges our suppliers, contractors and vendors to commit to the same.

This policy commits the Company and its suppliers to maintaining the standards of business ethics and human rights that are considered best practice, through establishing principles relating to:

- Delivering clear value for society through our activities.
- Recognising human and labour rights commitments enshrined in international law.
- Creating a fair and respectful working environment, free from harassment.
- Promoting equal opportunity, fostering diversity and inclusion of employees.
- Encouraging ethical and responsible behaviour by employees.
- Requiring suppliers to adhere to the same principles of business ethics and human rights.

The MarramWind Social Commitment Policy (the “Policy”) is designed to consolidate those principles and set out how they are applied within the Company.

1 Scope

The Policy applies to all individuals working at all levels of the Company, including directors, managers, employees (whether seconded from Shareholders, directly contracted or temporary) and contractors. It applies to all business dealings and transactions.

The Policy also aligns with the Company business principles and the Supplier Code of Ethics, to which all third parties working on the Company’s behalf are expected to adhere. To that end, any third party working on the Company’s behalf, including all relevant suppliers, contractors, and business partners, are expected to put in place appropriate measures to comply with the principles of this Policy.

The Policy extends to all types of Human Rights including Modern Slavery, Diversity, Inclusion and Anti-Harassment, recognising that this could affect employees or workers across our supply chain.

2 Respect for Human Rights

2.1 Key Principles

To achieve the aforementioned goals and commitments, the following main principles govern the conduct of the Company in all areas:

- a) Identify potential impacts that the operations and activities performed by the Company might have on human rights, either directly or through third parties.
- b) Have a due diligence system¹ that identifies situations and activities with a higher risk of violating human rights, in order to develop mechanisms for the prevention and mitigation of such risk and to redress the impacts if they occur.

¹ Due diligence checks of third parties, contractors, suppliers and vendors is provided through the Company’s Management Services Agreement with ScottishPower Renewables (UK) Ltd.

- c) Evaluate the effectiveness of the due diligence system on a regular basis using monitoring indicators, with a special focus on those centres of activity in which there might be a higher risk of violating human rights.
- d) Report the results of the evaluation of the effectiveness of the due diligence system to the Joint Venture Board.
- e) Advance a culture of respect for human rights and actions intended to promote awareness-raising in this field among its employees (whether seconded from Shareholders, directly contracted or temporary).
- f) Have in place reporting and grievance mechanism, equipped with adequate guarantees and settlement procedures, in order to respond to potential violations of human rights.
- g) Adopt as soon as possible such measures as may be applicable in the event of detecting any violation of human rights at the facilities of the businesses of the Company or of its suppliers, and report thereon to the competent government authorities in order for them to take any appropriate action if such violation may amount to an administrative, criminal or any other type of offence.

3 Modern Slavery

3.1 Definition

Modern Slavery is an overarching term used to describe slavery and forced labour in its various forms. In the United Kingdom it is a criminal offence. Victims of Modern Slavery could be trafficked for different types of exploitation including:

- **Forced labour**, where the person is coerced to work under a threat of some sort of punishment. This includes forced child labour.
- **Bonded labour**, where a person is required to work to repay a real or alleged debt.
- **Slavery and servitude**, where a person exercises (perceived) power of ownership over another. This includes domestic servitude, where a person is subject to the power of a family member or partner.
- **Human trafficking**, where a person arranges or helps to transport another person into a situation of exploitation.

3.2 Key Principles

The Company is committed acting across our business to prevent Modern Slavery within our activities. We will:

- Ensure employees seconded from Shareholder organisations into the Company undergo appropriate checks as required by respective Shareholder policies deemed, as a minimum, equivalent to this policy.
- Undertake appropriate checks for all directly employed employees to ensure that they are eligible to work in the UK and have independent access to their relevant documents.
- Only work with an authorised agency to recruit temporary or indirectly employed workers. For these workers, we will ensure that they are also subject to appropriate and rigorous checks to ensure their security to work.
- Carry out appropriate risk assessment and due diligence on third parties and transactions in order to identify areas of risk in relation to Modern Slavery.
- Include appropriate human rights and modern slavery clauses within our contractual arrangements to ensure that human rights principles are embedded within our business operations.
- Avoid doing business with others who do not commit to having appropriate processes and controls in place to mitigate the risk of Modern Slavery within their business.

- Communicate Company-wide, with the aim of raising employees' awareness for employees of MarramWind's approach to Modern Slavery.
- Provide appropriate training to all employees on the risks of Modern Slavery, including targeted training as appropriate.

4 Diversity, Inclusion and Harassment

4.1 Definition

- **Harassment** is defined as unwanted verbal or physical conduct of a moral or sexual nature that is intended to, or has the effect of, attacking the dignity of a person or creating an intimidatory, hostile, degrading, humiliating or offensive environment for such person. Examples include; derogatory impersonations of a person, sexual advances, imitations of the effects of a disability, disrespectful comments, racist, degrading or offensive gestures or images, the use of homophobic, transphobic or biphobic language, and ridiculing someone's religion or beliefs.
- **Discrimination** is any distinction, exclusion or preference based on the protected characteristics² of: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation that has the effect of nullifying or impairing equality of opportunity or treatment in the workplace. Discrimination can be **Direct** (i.e. treating someone with a protected characteristic less favourably than others), or **Indirect** (i.e. putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage).
- **Diversity** is the set of visible and non-visible characteristics that make people unique and singular, that is, the richness that each person contributes thanks to their variety.
- **Fairness** means distinct treatment as regards specific situations, always with the purpose of achieving equality in the exercise of rights.
- **Equality** means that all persons have the same rights, resources and opportunities regardless of any particular status.
- **Inclusion** is the recognition and appreciation of the different perspectives that each individual can contribute, generating opportunities so that everyone can realise their full potential and also fostering a sense of belonging that means they feel valued and part of a group or community.

4.2 Key Principles in relation to Equal Opportunity

To achieve the aforementioned objectives and commitments in the area of equal opportunity, the following main principles of conduct will govern:

- ensure non-discrimination among its employees (whether seconded from Shareholders, directly contracted or temporary) and positioning against any conduct or practice associated with prejudice on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation, or any other condition or characteristic of a person that is not related to the requirements to perform their job;
- standardise working conditions for seconded or directly hired employees;
- promote the organisation of working conditions, allowing for the reconciliation between personal and working life of all employees and protecting them in situations such as pre-adoption and adoption.

² Protected characteristics as defined in the UK Equalities Act 2010

4.3 Key Principles in relation with Diversity and Inclusion

The Company shall adopt the following measures to promote diversity and inclusion, understood as an organisational value and a differentiating competitive element:

- promote an inclusive organisational culture and management processes that enable all employees to contribute their knowledge, experiences and abilities, regardless of any personal or social conditions or circumstances;
- reinforce the commitment of the Company to equality, both within the organisation and in the communities in which we have a presence.;
- protect pregnancy, childbirth and post-delivery as specific situations of the female group, avoiding negative repercussions thereof on their professional career;
- promote physical and technological accessibility and support professionals with disabilities, encouraging the effective occupation thereof;
- foster an inclusive culture based on respect and collaboration;
- foster inclusive communication, both internally and externally, reflecting the diversity of the persons forming the Company;

4.4 Key Principles in relation to Prevention of Harassment and Discrimination

The Company has a firm commitment to prevent and combat harassment and discrimination, and shall adopt the following measures for this purpose:

- foster a preventive culture as regards any expression of any form of workplace violence, intimidation or harassment, through dissemination, education and training activities that occur with sufficient regularity to ensure up-to-date knowledge in this area;
- encourage leaders to set an example within their departments, promoting a respectful and healthy working environment;
- zero tolerance towards any conduct that involves intimidation or harassment;
- implement solutions and measures to safeguard the well-being of the persons affected by such behaviours, guaranteeing that there will be no retaliation; and
- adopt the measures that are necessary, including such disciplinary measures as are deemed appropriate, if applicable.

5 Further Information and Guidance

Further information can also be obtained from the UK Home Office Modern Slavery website at <https://www.gov.uk/government/collections/modern-slavery>

6 Reporting a Concern

It is the responsibility of all employees and third parties to report any perceived breaches of this Policy or any suspected incidences of Modern Slavery, Human Rights, Harassment within our business activities. If you feel comfortable to do so, you can discuss your concern with your line manager in the first instance. You or your line manager should report any concerns relating to a breach of this policy to the in one of the following ways:

Your Line Manager	Line managers should contact the MarramWind Compliance Officer for assistance as required
MarramWind Compliance Officer	neil.corlett@shell.com

If you feel uncomfortable discussing with your Line Manager or the MarramWind Compliance Officer, then report a concern through your respective Parent Company reporting tools, as listed below:

SPR Compliance Division Mailbox	compliancedivision@scottishpower.com
Shell Reporting a Concern Online	Reporting through the Shell Employee Portal
SPR Ethics Helpline	Reporting through the ScottishPower Employee Portal

In emergency where there could be imminent danger to someone's welfare, always call 999.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be incorrect. [We are committed to ensuring no one suffers any form of retaliation by reporting in good faith](#) their suspicion that modern slavery, of whatever form, is or may be taking place in any part of our business or in any of our supply chains.

7 Control, Evaluation and Review

MarramWind Compliance Officer shall review the contents of the Social Commitment Policy on an annual basis, ensuring that the policy reflects the recommendations and best international practices in effect³, and shall propose to the Joint Venture Board those amendments and updates that contribute to the development and ongoing improvement of the policy.

The approval of any amendment to this Social Commitment Policy shall in any case rest with the Joint Venture Board of the Company.

³ This shall include a review following the adoption of the UK Worker Protection Act in Q1-2025.

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