ESG POLICY

BSR GROUP HOLDINGS LIMITED

(British Solar Renewables limited, BSR Connect Limited, BSR EPC Limited, BSR EPC Netherlands BV, BSR Energy Limited – together known as the Group)

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###### REVISION STATUS

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# PURPOSE

BSR Group Holdings Limited and its subsidiaries (“BSR, ““it,” “our,” or the “Group”) exist to create abundant and accessible renewable energy which has a positive impact on people and the planet by developing, building, owning and operating renewable energy plants.

BSR recognises that our actions as a business and as individuals have consequences on:

* The natural environment.
* Society, communities and the people it interacts with.
* The integrity of our business.

# OBJECTIVE

BSR’s objective and commitment through this Environmental Social and Governance (“ESG”) policy is to:

* Identify environmental, social, and governance risks posed by and to our business.
* Seek to manage and mitigate those risks.
* have a positive impact on the environment, and society whilst maintaining the integrity and profitability of the Group for the benefit of employees and shareholders.

BSR has identified the following initial key areas where ESG issues impact, or are impacted by our business:

|  |  |  |
| --- | --- | --- |
| ENVIRONMENTAL | SOCIAL | GOVERNANCE |
| Climate change | Labour standards | Modern Slavery |
| CO2 reduction/Carbon Net Zero | Health and Safety, Everyone Safe Always, ISO 45001, LV and HV Rules, training | Supplier Engagement – PQQ, Approved Supplier process |
| Renewable Energy | Community relationships, Community Benefit, Social Impact | Stakeholders – Board, Shareholders, conflicts register |
| ISO 50001 -Energy Management/ usage – offices, sites, fleet | ISO 9001 – customer satisfaction, surveys | Cyber security |
| Biodiversity- target 25% gain, LEMPS, ecological surveys, bird boxes, bug hotels, bees | Culture, employee engagement and values | GDPR, data protection |
| ISO 14001 | Diversity, inclusion, accessibility | Anti-bribery policy |
| Sustainable suppliers – Banks, Pensions, Energy | Mental health – Mental health first aid training, Life Works, sport, yoga | Supplier engagement, PQQ |
| Reduce pollution | Physical Health, First aid training, AXA, sport, yoga | KYC, Sanctions Policy, World Check |
| Stewardship | Apprenticeships, training, mentoring | Whistleblowing, transparency |

# ENVIRONMENT

BSR’s passion for renewables and the environment may stem from its roots in the beautiful Somerset countryside. The objective is always to work with stakeholders to minimise the impact that our projects have on the environment during construction and maintenance and to enhance biodiversity for the local area. BSR targets a 25% net biodiversity gain for each project submitted to planning. BSR will continue to operate in a way that improves soil structure and health, supports healthy ecosystems, enhances biodiversity and protects the planet. Looking ahead the Group will focus more strongly in this area, as global environmental impact and net zero carbon is a key issue for all of us. Our aim will be to act locally to impact globally.

# SOCIAL

People

BSR is fundamentally a people business and creating a culture that allows us to recruit and retain first-class talent is really important. As an equal opportunities’ employer, diversity and inclusion form an important part of this culture. Comprehensive training programs are offered to all of our staff, with the aim of nurturing talent and creating opportunity. There is always more that can be done to put our people first and create a working environment to be proud of.

Health and Safety

BSR has a culture in which “Everyone is safe, always.” The responsibility to keep employees and sub-contractors safe is a key area of risk for the business and hence a priority.

BSR has:

* Achieved ISO 45001.
* Established a professional in-house health and safety team to manage and mitigate risk.
* Developed a rigorous approved supplier process to assess assessing contractors from a health and safety, modern slavery and financial perspective.
* Utilised Sevron software to help us develop risk assessments and manage incident and positive observation reports.
* Created a well-developed set of HV rules and are leaders in the solar industry in having a set of LV rules produced with external professional support.

# GOVERNANCE

Integrity and reputation are essential to the business. BSR has robust governance and a strong compliance system which includes GDPR, anti-bribery, Modern slavery and cyber security policies. These policies are underpinned by a comprehensive training program and encouragement of an open and transparent approach to speaking up. Governance is key to a healthy well-managed and sustainable business. BSR is committed to strengthening our existing systems to support the eradication of modern slavery from solar supply chains and continuing to raise awareness of the principles of good governance through the use of annual training.

# DELIVERY

The Deputy CEO will have responsibility for ESG matters, with full support from the CEO and the Core Team. BSR has appointed ESG champions from across the business (the “ESG Team”) who meet monthly. The purpose of the ESG Team will be to:

* Continually identify environmental, social and governance risks posed by and to our business, ensuring that BSR remains up to date with the latest law, guidance, approved codes of practice and best practice.
* Explore ways to manage and mitigate the risks identified.
* Instigate and implement initiatives which will have a positive impact on the environment and society whilst maintaining the integrity and profitability of the Group for the benefit of employees and shareholders.

The Group will also:

* Comply with law, guidance, approved codes of practice and best practice in relation to environmental, social and governance matters.
* Seek continuous improvement in all ESG matters.
* Raise awareness of and encourage participation of our staff, Stakeholders, customers and suppliers in ESG matters.
* Regularly communicate our ESG aims and objectives to staff, external stakeholders and the wider community.
* Carry out an annual internal audit to measure our performance against the ESG Targets that the ESG Team sets and the Board approves.
* Report to the Board at each Board meeting and to the wider business on ESG matters.

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**Tim Humpage**

**(CEO)**