

OVO Group Supplier Code of Conduct

Version: March 2020

OVO's mission is to provide clean, affordable energy for everyone.

Our company values are Do what is right, Find a better way and Build something great. We want to leave the world better than we found it and our suppliers and business partners play a critical role in delivering our purpose and our products and services.

We enact our values through our internal Code of Conduct in the form of our Business Principles, which provide our people with guidance for how to behave. We expect all of our suppliers and business partners to act and behave in a way that upholds our values too. For the avoidance of doubt, this Supplier Code sets out the standards of behaviour that we expect anyone working with OVO to comply with, in addition to all applicable laws.

Our Code is informed by the United Nations Universal Declaration of Human Rights and is based on the Core Conventions of the International Labour Organization (ILO). Our Code encompasses 12 standards which are outlined below and apply to all suppliers and business partners. All business must be conducted ethically and with integrity. Business partners must comply with all applicable laws and regulations. When differences arise between standards and legal requirements, the stricter standard shall apply, in compliance with applicable law.

1. Employment Relationship

Our business partners shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labour laws and regulations.

2. Non-discrimination

Our business partners shall ensure that no person will be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

3. Harassment or Abuse

Our business partners shall ensure that every employee will be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

4. Forced Labour

Our business partners shall ensure that there is no use of forced labour, including prison labour, indentured labour, bonded labour or other forms of forced labour.

5. Child Labour

Our business partners shall ensure that no person under the age of 15 or under the age for completion of compulsory education, whichever is higher is employed.

6. Freedom of Association and Collective Bargaining

Our business partners shall recognize and respect the right of employees to freedom of association and collective bargaining.

7. Health and Safety

Our business partners shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities.

8. Hours of Work

Our business partners shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular

basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

9. Compensation

Our business partners shall ensure that every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract.

10. Bribery and corruption

Our business partners shall ensure zero tolerance towards bribery, money laundering, fraud, tax evasion and corruption. In their dealings with OVO, business partners will avoid all conflicts of interest, and any that do arise are reported to OVO immediately. Business partners must report periodic, fair and accurate reports of financial performance, and compete fairly, not using or passing insider information.

11. Security

Our business partners shall have robust cybersecurity measures in place to protect the privacy of all individuals and the confidentiality of any personal data. Our business partners must also ensure that all OVO information is confidential unless specific authorisation has been given by OVO management.

12. Environment

Our business partners shall be committed to good environmental stewardship and strive to minimise resource consumption, emissions and pollution. Business partners shall report their carbon emissions and be able to demonstrate emissions reduction initiatives that are in place.

OVO reserves the right to audit business partners against this Code and business partners are asked to retain documentation that demonstrates compliance, to which OVO may request access. We will seek to work with our business partners to resolve non-compliance with the Code, but we reserve the right to terminate contracts in the event of a material breach.

Please sign below to confirm adherence with the code.

Company name

Full name

Signature

Date