

Carsphairn Renewable Energy Fund Limited

Standards of Conduct / Corporate Responsibility Policy



Introduction

CREFL is committed to maintaining the highest possible ethical standards in all its business activities.

The purpose of this policy is to set out the standards of conduct CREFL expects of its Directors, volunteers, contractors, any other authorised representatives.

Policy

CREFL's success depends on the confidence and trust of all those with whom CREFL comes into contact. That trust and confidence depends on CREFL's reputation for acting in a professional manner, ethically and with integrity. CREFL expects its Directors and representatives to:

- comply with all applicable laws and ethical standards;
- comply with all the provisions included in Windfarm Operator agreements by which CREFL are bound;
- act with honesty and integrity on CREFL's behalf;
- avoid bringing CREFL into disrepute either when acting for CREFL or as an individual;
- protect confidential information they are exposed to and ensure they comply with the CREFL Privacy Policy;
- be impartial and declare any interests in relation to all CREFL activities;
- ensure that they take appropriate action and do not take part in any discussion or voting on applications where they have a conflict of interest (including leaving the room/ virtual meeting during discussion and voting);
- ensure they do not engage in any practices that would constitute an offence under the Modern Slavery Act 2015;
- take reasonable steps to prevent slavery and human trafficking in connection with CREFL business;
- promote good practices which foster and promote respect for human beings;
- avoid complicity, in any form, in human rights abuses;
- eliminate all types or sorts of forced/compulsory/child labour;
- maintain preventative focus in the face of environmental issues in order to achieve sustainable development, limiting activities that may negatively impact the environment;
- treat others with respect and understanding and ensure their actions do not cause physical or emotional harm, humiliation or exploitation to any individual;
- report to the Secretary any potential conflicts of interest that may affect their ability to make objective decisions;
- not speak publicly on behalf of CREFL unless they have prior approval from the Board;
- deal promptly with any matters of business to ensure that the CREFL business can be completed with minimal delay;
- report any concerns regarding the way a Community Fund is being administered to either the Board, a Board member or the Compliance Department of the Windfarm Operator as appropriate;
- act in line with all other CREFL policies and procedures;

A Director must not:

- have ever been convicted of fraud, misrepresentation, bribery, corruption, tax evasion or other related activities;
- have been disqualified from Public Office or as a Company Director in the previous 5 years or be currently under investigation that may result in this.

Responsibilities

Compliance with this policy is the responsibility of all Directors and officials of CREFL. If and when an instance where a breach of this policy is identified, remedial steps must be taken immediately.

The Chair of CREFL's Board should ensure their members are aware of this policy and of their responsibilities to act in accordance with its procedures.