
Octopus Energy Generation Supplier Code of Conduct

June 2026

Octopus Energy Generation (“OEGEN”) is a trading name of Octopus Renewables Limited (“ORL”), which is authorised and regulated by the Financial Conduct Authority (FCA Register No. 473797), with registered office at UK House, 5th Floor, 164-182 Oxford Street, London, United Kingdom, W1D 1NN. Registered in England and Wales (Company No. 05857926). ORL is a wholly owned subsidiary of Octopus Energy Group Limited (“OEG”) and is part of the Octopus Energy Generation business within OEG. VAT No 358672751.

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Frequency of Review

The Octopus Energy Generation Supplier Code of Conduct (Code) should be updated whenever there are material updates to any legislation or practices contained in the Code but in no case less frequently than on annual basis.

Supplier Code of Conduct

Foreword

Octopus Energy Generation (“OEGEN”) has a core mission to accelerate the transition to a future powered by renewable energy. OEGEN wants to change the world for the better and strives to do business the right way. For OEGEN this means engaging with suppliers and building a culture where people do the right thing, even when no one is watching. OEGEN maintains a zero tolerance approach to human rights violations, environmental degradation, bribery, and corruption.

In accordance with OEGEN’s core values, OEGEN requires its direct suppliers, contractors, and business partners (“Suppliers”) to conduct their business responsibly. For OEGEN, it is important that all activities and business conducted in OEGEN’s supply chain seek to be in line with this Supplier code of conduct (the “Code”) at a minimum.

The requirements in this Code are set based on the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises.

Suppliers that provide products or services to OEGEN shall comply with all laws and regulations applicable to their business’s geographical boundaries. This includes those respecting individuals’ human rights and environmental and safety impacts of products and services.

Where any conflict arises between the standards set out in this Code and applicable legal or regulatory requirements, the stricter standard shall apply.

Suppliers shall require their own contractors and suppliers (“Sub-contractors”) to comply with this Code.

To the extent that any Sub-contractor does not comply with this Code, the Supplier shall provide an explanation to OEGEN as to why it is not operating in compliance with the Code. This expectation applies in particular to Sub-contractors of a material nature, including those providing critical goods or services, operating in higher risk geographies, or associated with elevated human rights or environmental risks.

Where a Supplier does not require its Sub-contractors to comply with this Code, the Supplier shall demonstrate that its own supplier standards are of an equivalent standard.

This Code shall apply to all Supplier operations, including manufacturing, delivery, sales, and support. OEGEN may apply a risk based and proportionate approach to the application of this Code, taking into account the nature, scale, and risk profile of the Supplier relationship.

Compliance with this Code shall be included in new contractual obligations unless otherwise agreed in writing. Suppliers may be required to provide information or documentation to demonstrate compliance, including information on relevant Sub-contractors.

OEGEN shall carry out periodic reviews of Suppliers and ongoing Supplier partnerships to confirm continued compliance with this Code.

Respect for human rights

Suppliers shall recognise and respect internationally recognised human rights standards in accordance with the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, and the International Labour Organisation (ILO) International Labour Standards.

Suppliers shall avoid directly causing or contributing to adverse human rights impacts through their operations and shall prevent or mitigate adverse human rights impacts that are directly linked to OEGEN through their business relationships.

Non-discrimination and equal opportunity

Suppliers shall ensure the fair treatment of all workers and shall not discriminate on grounds such as race, colour, gender, nationality, disability, age, sexual orientation, political opinion, religious belief, or any other status protected by applicable law.

Suppliers shall promote equal pay for equal work, ensuring that workers with comparable qualifications, experience, and performance receive equal remuneration for the same or similar roles under comparable conditions.

Suppliers shall provide accessible mechanisms through which workers and affected stakeholders may raise concerns or grievances without fear of retaliation.

Child labour

Suppliers shall not employ child labour, as defined by the ILO conventions, and shall not employ workers under the age of 15 (or a higher minimum age, where required by local law).

Suppliers shall not employ young persons under the age of 18 in hazardous work.

Suppliers shall consider child labour risks within their own supply chains and take reasonable steps to prevent such risks.

Forced or compulsory labour

Suppliers shall prohibit all forms of forced, bonded, or compulsory labour, including modern slavery and human trafficking.

Employment shall be freely chosen, and workers shall be free to terminate employment in accordance with applicable law or contractual notice periods. Suppliers shall not require workers to lodge deposits, identity documents, or personal belongings as a condition of employment.

Suppliers are expected to identify, assess, and mitigate risks of modern slavery and human trafficking within their operations and supply chains, proportionate to their size, sector, and geographic exposure

Wages, benefits, and working hours

Suppliers shall:

- comply with all applicable wage and hour laws and regulations, including those relating to minimum wage, overtime, and statutory benefits;
- strive to pay workers a living wage and, as a minimum, pay the higher of the legal minimum wage or applicable industry standards;
- compensate overtime hours at the legally required premium rate;
- clearly communicate pay structures and pay periods to workers;
- pay accurate wages in a timely manner; and
- not permit any unlawful, unauthorised, or disciplinary salary deductions.

Suppliers shall maintain work hours in compliance with applicable national legislation and industry standards regarding working hours and public holidays. Suppliers shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

Freedom of association and collective bargaining

Suppliers shall respect employees' freedom of association and right to collective bargaining, in accordance with applicable law and ILO conventions.

Where these rights are restricted by law, Suppliers shall allow alternative lawful forms of employee representation

Occupational health and safety

In compliance with applicable laws and regulations, Suppliers shall ensure occupational health and safety through the provision of safe working conditions that do not jeopardise employees' physical, mental, or emotional wellbeing.

Hazards and associated risks shall be identified, assessed, and controlled, and appropriate safeguards, training, and protective equipment shall be provided to prevent accidents, injuries, and work-related ill health.

Suppliers shall implement appropriate incident reporting, emergency preparedness, and contractor safety management processes proportionate to operational risk.

Rights of indigenous peoples

Where relevant, Suppliers shall respect the rights of indigenous and tribal peoples and their social, cultural, environmental, and economic interests, including their relationship with land and natural resources.

Suppliers should follow the principles of free, prior, and informed consent, and participation to obtain broad-based consent of indigenous and tribal peoples in their activities.

Anti-corruption

Suppliers shall adhere to the highest standards of ethical conduct and comply with all applicable anti-bribery and anti-corruption laws.

Suppliers shall not engage in any form of corrupt practice, including bribery, fraud, or extortion, whether directly or through third parties.

Environment

Suppliers shall identify and comply with all applicable environmental laws and regulations and maintain all required licenses, permits, and registrations.

Suppliers shall maintain environmental management practices proportionate to the nature, scale, and environmental risk profile of their activities, including clear allocation of responsibility for environmental compliance and, where relevant, emergency preparedness and response arrangements.

Suppliers shall manage hazardous materials responsibly and implement appropriate controls to prevent pollution to air, land, and water.

Suppliers shall seek to improve resource efficiency across their operations, including energy, water, and materials, and take reasonable steps to reduce greenhouse gas emissions associated with their activities. Suppliers shall reduce waste arising from their operations and prioritise reuse and recycling where technically and economically feasible.

Where Suppliers have operationally material environmental impacts, they are expected to maintain an environmental policy and/or an environmental management system, or equivalent documented controls, appropriate to their activities and risk exposure, to support ongoing monitoring and continuous improvement.

Suppliers are encouraged to measure, manage, and where appropriate publicly report greenhouse gas emissions associated with their operations.

Conflict minerals

Suppliers that provide products containing tin, tungsten, tantalum, gold, or other conflict minerals shall seek to identify and assess the origin and chain of custody of such minerals. Where minerals are sourced from conflict-affected or high-risk areas, Suppliers shall apply enhanced due diligence in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, where relevant.

Governance, monitoring, and consequences

Suppliers may be required to confirm compliance with this Code and, upon reasonable request, provide information or documentation to demonstrate such compliance.

Failure to comply with this Code may result in remedial actions, suspension, or termination of the business relationship, depending on the severity and persistence of the non-compliance. OEGEN reserves the right to conduct proportionate and risk-based assessments or audits relating to compliance with this Code.