**Plug-N-Go Group : Ethical Policy**

**Approved and adopted by the Board of Directors 2020-09-07**

Our over-reaching ethical policy influences all major decisions made by PNG, its employees and trading partners. These are the principles, rules and guidelines within which PNG’s people operate, based on openness, honesty and care for all our stakeholders. Adherence to these policies is a condition of employment.

PNG strives to meet the requirements of the Ethical Trading Initiative (ETI) Base Code

* The PNG Group’s first priority is the health and safety in the workplace of all its staff and the staff of its suppliers and sub-contractors and others in our supply chain.
* Our second priority is equal opportunity and diversity. Whatever your race, religion or sexual orientation, your opportunities will be based purely on merit. We do not support modern-day slavery or human trafficking
* In third place is caring for the environment, sustainability, conservation, recycling and energy use. This includes sourcing our electricity supply, our hardware and our office supplies from renewable / sustainable sources
* The fourth policy is ethical trading, the business conduct and practices, treatment of our customers and the relationships which we have with our suppliers. This includes a code of labour practice which we expect all our suppliers to work towards.
* The final policy is corporate governance : the manner in which the Board operates and makes ethical and responsible decisions, ensuring all team members can feed back their views to the Board. Other aspects of this policy are oversight of the Board and senior management and integrity in financial reporting. Another important principle is recognizing and managing risk throughout PNG.

Each of the five policies above are detailed in their own policy statements.

**Plug-N-Go Group : Health and Safety at Work Policy**

The Board of PNG considers that the health and safety of its employees and subcontractors is of prime importance. The Board places great emphasis on regularly reviewing and updating the company’s Health and Safety at Work policy, detailed below :

* Each company in the PNG Group must comply with the local Health and Safety at Work Legislation and Regulations (including weekly monitoring of covid 19 risks)
* The objective of this policy is to prevent accidents and work related illness by identifying and managing the risks within the office and on remote charge point installation sites (covered by Method and Risk assessments) and to have first responders on-site if a situation does occur.
* A main Board director must be appointed to have overall responsibility for Health and Safety throughout the PNG Group and should report frequently to the Board.. An H&S officer must be appointed (and trained) in each jurisdiction / office, who will report to the main Board director and a suitable person on-site, in case a situation does occur (clearly defined in the Method and Risk assessment).
* The H&S officer must identify the hazards within the office or on the remote site, assess the risks, establish methods and procedures which control the risks, record their findings, regularly review the controls and report frequently to the main Board director, especially in the case of an incident.
* In each office, the appropriate number of staff should be trained to know how to respond to an accident or sudden illness or a fire. All staff should be informed as to the identity of the first aider and /or the fire warden . Each office is to maintain adequate and up-to-date first aid equipment, personal protection equipment and fire extinguishers.
* Make sure that escape routes in each office are well signed and kept clear at all times. Test evacuation plans from time to time and modify as necessary
* In each PNG office, maintain an H&S Incident / Accident register and ensure it is reviewed regularly by the main Board director in charge of H&S
* Ensure all sub-contractors have an adequate H&S policy
* All PNG workplaces are to have adequate staff facilities (especially toilets and washbasins)
* Consult with staff regularly on their H&S concerns and address any issues
* In case of employees working from home (which may be necessary due to covid 19) ensure that that an equivalent WFH practice is in place, similar to the “at work” procedure
* Maintain a policy of Employers’ Liability insurance with an adequate sum assured

**Plug-N-Go Group : Equal Opportunity and Diversity Policy**

PNG is committed to ensuring that our employment practices and the enforcement of corporate regulations provide protection of the rights of all those who work for us. In many areas we aim to operate above the minimum standards required by law to ensure our employees are safe, rewarded and valued.

All employees are provided with an easy-to-read formal contract of employment with particular clarity as to their job description and the salaries we will pay them. All employees are also provided with an Employee Handbook (updated from time to time), which explains the in-house regulations and the conduct we expect of them.

No discrimination is practised :

* There is no discrimination in pay, compensation, hiring, access to training and promotion, termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation or political affiliation.
* Opportunities for personal and career development are equally available to all employees and are based purely on merit and track record.
* Harassment, physical verbal and sexual threats, abuse or intimidation is strictly prohibited and will be grounds for summary dismissal, if proven.

With regard to remuneration and working hours :

* Staff pay rates are above the national legal minimum wage.
* Staff are not required to work in excess of 40 hours per week
* Staff are given 2 days off work per calendar week (Monday to Sunday)
* If it is practicable, PNG supports employees working from home, with occasional team meetings in the office
* Staff are given a comprehensive contract of employment on joining, setting out in simple terms the respective obligations of the employer and the employee

Labour only contracting or subcontracting are not used as a means to avoid PNG’s obligations under labour or social security laws.

Employment agencies contracted to supply temporary staff are required to demonstrate that they adhere to this policy. All agencies are required to ensure that temporary staff supplied are eligible to work in their respective jurisdiction.

**Plug-N-Go Group : Environmental and Sustainability Policy**

The purpose of PNG Group is to help improve the environment by facilitating the transition from internal combustion vehicles to electric vehicles. In the UK, air pollution is now responsible for between 30,000 and 50,000 premature deaths annually. In addition it causes millions to suffer from long term illnesses, such as asthma to lung cancer, that don’t necessarily kill you, but make life utterly miserable.

PNG’s revenue is largely earned from the re-sale of electricity through its charge points and the charging of related infrastructure fees to EV drivers. PNG’s main environmental policy is that, wherever possible, the electricity it sells comes from a renewable source (e.g. wind turbines, solar panels etc.,).

Our environmental policy is to :

* Comply with all applicable environmental legislation and sustainability commitments and adopt best environmental practices
* Prevent pollution and reduce consumption of resources through waste management strategies that promote waste reduction, re-use, and recycling
* Dispose of end-of-life charge points and other hardware in an environmentally safe and responsible manner
* Invest in technologies that provide alternatives to physical business travel
* Ensure our employees are aware of the environmental impacts of their activities and encourage them to minimize those impacts through regular awareness campaigns and training.
* appoint an in-house environmental champion to pursue a programme of continuous monitoring and improvement through employee feedback, in-house reviews and target setting.
* Include environmental KPIs in management information.
* ensure that our suppliers and sub-contractors are environmentally conscious and have an environmental policy
* communicate our environmental commitment to our customers, location partners and the public generally and encourage them to support it

We are working towards Investors in the Environment (iiE) and ISO 14001 certifications

**Plug-N-Go Group : Ethical Trading Policy**

As a socially responsible small business, our customers, suppliers and the local community have the right to expect :

* Customers will be treated with respect and in a fair and open manner. The reputation of PNG is based on the reliability of our charge points and we will work our hardest to sort any problem which EV drivers may experience in the shortest possible time. We operate a 24/7 customer helpline.
* The cost of charging will be clearly displayed, either on signage next to the charge point, on the charge point screen or on the PNG app. so that EV drivers can decide up-front whether to charge there or go elsewhere. Details of our charge points and the price per kWh will also be displayed on a number of aggregator websites (such as Zap Map)
* We will keep details of our customers totally confidential. We will not continue to hold customer information which we do not need to operate our charge points. Customer information will not be used for any other purpose. We will act in full compliance with the Data Protection legislation in the relevant jurisdiction.
* PNG will not make claims to customers or site owners that it knows it cannot fulfil. We will be upfront if we feel we cannot provide the service or product
* PNG is committed to monitoring social standards in our supply chain. Subcontractors and suppliers will be asked to complete and keep updated a PNG questionnaire. We will ensure that all subcontractors and others involved in the delivery of PNG’s services and products maintain a similar ethical trading policy to that of PNG
* PNG will comply with the terms of payment agreed with Suppliers. If there is any reason why payment won’t or can’t be made on time (e.g. short delivery or defective work), PNG will give the supplier notice and the reason why
* PNG will always consult with the local community and Local Authority to ensure that a new installation is sited in the most convenient place for the public.
* Charging revenue received on behalf of site owners (for instance where we provide back-office cloud services) will not be co-mingled with PNG office funds, but kept in a separate dedicated bank account until paid away.
* In case anything does go wrong, PNG will maintain an adequate level of liability insurance

**Plug-N-Go Group : Corporate Governance Policy**

Despite its small size, PNG has adopted and will be working towards compliance with The UK Corporate Governance Code (July 2018 edition) published by the Financial Reporting Council.

To succeed in the long term, directors, and the companies they lead, need to build and maintain successful relationships with a wide range of stakeholders. These relationships will be successful and enduring if they are based on respect, trust and mutual benefit. Accordingly, PNG’s culture promotes integrity and openness and is responsive to the views of shareholders and wider stakeholders.

The principles on which PNG’s corporate governance is built are:

* Maintaining an effective and entrepreneurial board, whose role is to promote the long-term sustainable success of the company, generating value for shareholders and contributing to wider society.
* The Board must have a clear and agreed view of the company’s purpose, values, policies and strategy. All directors must act with integrity, lead by example and promote the stated culture
* The Board should be structured so that there is a division of responsibilities. The Board should comprise both executive and (independent) non-executive directors (NEDs), so that no one individual or small group of individuals can dominate the Board’s decision making. NEDs should be given sufficient notice, briefing and time to meet their governance responsibilities. NEDs should challenge management (constructively) and hold them to account.
* The Board will also establish a framework of prudent and effective controls, which enable risk to be assessed and managed
* The Board will ensure that workforce policies and practices are consistent with the company’s policies and support its long-term sustainable success. The workforce should be able to raise any matters of concern
* The remuneration of the executive directors (including incentive arrangements) should be at a level designed to support strategy and promote long-term sustainable success and clearly linked to the successful delivery of the company’s long-term strategy. There should be a formal and transparent procedure for setting levels of remuneration.
* NEDs should exercise independent judgement when supporting or opposing Board resolutions
* The Board must present regular fair, balanced and understandable assessments of the company’s position and prospects to the shareholders
* The Board must avoid conflicts of interest