



Frodsham Solar Outline Skills, Supply Chain and Employment Plan

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1.0 INTRODUCTION

1.1 Purpose of this Report

- 1.1.1 This document provides the outline Skills, Supply Chain and Employment Plan (the “Plan”) for the construction, operation and maintenance of the Frodsham Solar project (‘the Proposed Development’).
- 1.1.2 This document has been prepared by of Frodsham Solar Limited (‘the Applicant’) as part of the information that accompanies the Development Consent Order (‘DCO’) for the Proposed Development. Should the Proposed Development be consented, further details of the measures put in place to achieve this would be set out in substantial accordance with this outline Plan, following consultation with stakeholders involved in skills development, employment, and the local supply chain. The final plan will describe the proactive engagement activities undertaken by the Applicant with the organisations described in this document in the preparation of the final Skills, Supply Chain and Employment Plan and how the outcome of the engagement activities influenced the final plan.
- 1.1.3 The Plan sets out the potential benefits of the Proposed Development. It includes potential activities for the Applicant to carry out post-consent to promote improvements related to skills, supply chain and employment (‘SSEC’). It proposes how the Applicant will collaborate with local stakeholder organisations to achieve these benefits.
- 1.1.4 The Plan has been produced based on preliminary assessments of the local workforce, socioeconomic conditions, and current policy drivers in the local area. The contents of the Plan are subject to the agreement of the local planning authority, Cheshire West and Cheshire Council (‘CWaCC’), and may be altered according to their recommendations.

1.2 Potential Benefits of the Proposed Development

1.2.1 The Proposed Development could provide the following benefits related to SSCE:

1.2.2 Stimulate sustainable growth of the region's industrial sector;

- Provide employment for local people;
- Improve workforce diversity and inclusion;
- Increase green skills capabilities of the workforce and young people;
- Provide opportunities for research, innovation, and education in the renewable energy and environmental sectors;
- Enforce high traceability and environmental sustainability standards across the supply chain; and
- Encourage procurement activities to benefit the local economy.

1.2.3 The Applicant proposes to work with the partners set out in Table 1-1 to agree ways that the Proposed Development could deliver these benefits. This list is indicative and will be refined when producing the full plan.

Table 1-1 Proposed partners for the production and delivery of the full Plan

Primary Public Sector Partners	Cheshire West and Chester Council (Skills & Employment Team) Frodsham Town Council Helsby Town Council Elton Parish Council Ince Parsh Council
Education and Training Providers	University of Chester West Cheshire College Ormiston Bolingbroke Academy (6 th Form), Runcorn EPSRC Centre for Doctoral Training in Green Industrial Futures
Business Sector Groups	Net Zero North West (NZNW) ORIGIN Business Forum Enterprise Cheshire & Warrington West Chester and North Wales Chamber of Commerce The Federation of Groundwork Trusts (tbc)
Research Organisations	Industrial Decarbonisation Research and Innovation Centre (IDRIC) University of Chester (eg. Thornton Science Park)

Environmental Organisations	Natural England Royal Society for the Protection of Birds (RSPB) Cheshire and Wirral Ornithological Society
Inclusive Employment Charities	Ambitious About Autism Energyz Black

1.3 Scope

- 1.3.1 The Proposed Development comprises a new solar energy generating station and an associated on-site Battery Energy Storage System (BESS) on land at Frodsham Marsh, Frodsham, Cheshire West and Chester ('the Site'). The Proposed Development also includes the associated infrastructure for connection to the local electricity distribution network, as well as a private-wire electricity connection that would enable local businesses to utilise the renewable electricity generated by the Proposed Development.
- 1.3.2 The Proposed Development would be situated in Cheshire, north of the town of Frodsham. The Proposed Development will connect to the nearby Frodsham Substation from which the electricity generated will be supplied to the Distribution Network Operator, SP Energy Networks, who are responsible for distributing electricity across Cheshire and Merseyside. Consequently, the Proposed Development is anticipated to provide significant benefits to the ceremonial counties of Cheshire and Merseyside, which includes the nearest cities of Cheshire and Liverpool.
- 1.3.3 The Applicant anticipates that the majority of the potential SSCE benefits will be concentrated within a smaller region, encompassing Cheshire West and Chester and the majority of Halton. In particular, the Plan will focus on the closest settlements to the Proposed Development, which are the towns of Frodsham, Runcorn, and Ellesmere Port; and the villages of Ince, Helsby and Elton.

1.3.4 The Order Limits of the Proposed Development cover approximately 339.5 hectares of land within the Frodsham Marshes and comprises of a series of distinct sub-areas:

- i) Solar Array Development Area ('SADA')
- ii) Main Site Access
- iii) Non-Breeding Bird Mitigation Area ('NBBMA')
- iv) Skylark Mitigation Area ('SMA')
- v) Main Access Route
- vi) SPEN Substation Connection
- vii) SPEN Substation Access

1.3.5 The Plan focuses primarily on maximising the proposed benefits associated with the SADA, NBBMA and SMA, where the majority of opportunities relating to employment, skills and supply chain would arise.

2.0 BASELINE

2.1 Local Industry

2.1.1 The North West region hosts a high concentration of energy-intensive industries, including the UK's highest concentration of advanced manufacturing and chemical production.¹ The Proposed Development would be located at the heart of a nationally significant industrial corridor, stretching from Ellesmere Port toward Runcorn, where over 5% of the UK's energy is consumed.² Within the industrial town of Runcorn (which specialises in the production of chemicals) notable developments include the INEOS Inovyn Runcorn Site, which produces industrial chemicals and includes an 800MW gas-fired power station. Encirc Glass (a glass manufacturer located in Elton) is located a short distance to the west from the development. Further west is the town of Ellesmere Port, which is home to the Stanlow Oil Refinery, centred within the HyNet low-carbon industrial cluster and in the process of becoming the UK's first low carbon refinery.³ Other major industrial sites in Ellesmere Port include the Innospec chemicals manufacturing plant and the Vauxhall Motors car factory.

2.1.2 UK industry is currently at an economic disadvantage relative to European and G7 competitors, due to the significantly higher industrial power prices.⁴ The Government has identified these high electricity costs as a significant barrier to growth and investment in the UK.⁵ For example, at a site that

¹ Net Zero North West & UK Research and Innovation, (2023). *North West Cluster Plan*. Available at: <https://www.netzeronw.co.uk/north-west-cluster> [Accessed 8 April 2025]

² Protos, (2017). UK's first Energy Innovation District [online]. Available at: <https://www.protos.co.uk/news/uk-s-first-energy-innovation-district> [Accessed 8 April 2025].

³ Essar (30 April 2025). Essar Energy Transition's Hydrogen-Ready Furnace now Powering EET Fuels' Stanlow Site [press release]. Available at: <https://www.essar.com/inthenews/essar-energy-transitions-hydrogen-ready-furnace-now-powering-eet-fuels-stanlow-site/> [Accessed 23 May 2025].

⁴ Department for Energy Security and Net Zero (2024). International Industrial energy Prices. Industrial electricity prices in the IEA (QEP 5.3.1) [Statistical data set]. Available at: <https://www.gov.uk/government/statistical-data-sets/international-industrial-energy-prices> [Accessed 19 May 2025].

⁵ Department for Business & Trade (2024). *Invest 2035: the UK's modern industrial strategy*. [online] Available at: <https://www.gov.uk/government/consultations/invest-2035-the-uks-modern-industrial-strategy/invest-2035-the-uks-modern-industrial-strategy> [Accessed 19 May 2025].

adjoins the Order Limits for the Proposed Development, the now former CF Fertilisers Plant was decommissioned during 2022 with high fuel costs being reported as a contributing factor.⁶ The closure resulted in the loss of hundreds of jobs and caused knock on effects for the sector.⁷

2.1.3 The Proposed Development would be located in an area of industry looking to lead the way in the deployment of low carbon infrastructure. The SADA overlaps the Frodsham Wind Farm, comprising of 19 large-scale wind turbines that supply renewable electricity to the surrounding area. The Runcorn Energy from Waste Plant, operated by Viridor, is north of the Proposed Development. Additionally, the Protos hub, consisting of clusters of innovative technologies in energy generation and resource management aiming towards clean growth, neighbours the Proposed Development. The neighbouring Protos development has an existing Biomass Energy Plant, as well as plans to develop a carbon capture facility. Protos has already attracted £500 million of investment into the local area, and has the potential to deliver up to £1.5 billion and 1,000 jobs over the next 15 years.⁸

2.2 Important Employment Areas

2.2.1 CWaCC has identified the ten most significant employment sectors in the authority (based on the number of people employed, revenue generated, and future growth potential):⁹

i) Advanced Manufacturing and Engineering

⁶ CF Industries (2023). "CF Fertilisers UK Announces Proposal to Permanently Close Ammonia Plant at Billingham Complex". Corporate Communications. Available at: <https://www.cfindustries.com/newsroom/2023/billingham-ammonia-plant> [Accessed 19 May 2025].

⁷ Hannah Finch (25 August 2022). "Production halted at CF Industries - the wider impact and what happens next" [online]. *Business Live*. Available at: <https://www.business-live.co.uk/manufacturing/production-halted-cf-industries-wider-24853358> [Accessed 19 May 2025].

⁸ Protos (2025) *Peel NRE acquires former CF Fertilisers site to drive clean energy transition* [press release]. Available at: <https://www.protos.co.uk/news/peel-nre-acquires-former-cf-fertilisers-site-to-drive-clean-energy-transition/> [Accessed 23 May 2025].

⁹ Cheshire West and Chester Council and NHS (2023). "Important Areas of Employment in Cheshire West and Chester" [online]. *Live Well Cheshire West*. Available at: <https://www.livewell.cheshirewestandchester.gov.uk/Information/Employment-areas-in-Cheshire-West-and-Chester> [Accessed 19 May 2025].

- ii) Agriculture and Food Production
- iii) Construction
- iv) Creative and Digital
- v) Energy
- vi) Financial, Business & Professional Services (FBP)
- vii) Health and Social Care
- viii) Green Skills – Land Use and Climate Change Mitigation
- ix) Hospitality and Retail
- x) Logistics

2.3 Green skills gap

2.3.1 Despite the growing number of employment roles in the low-carbon sector, there is a shortage of workers currently possessing the required skills.¹⁰ The global green talent pool is not growing at a fast enough rate to keep up with the projected demand for green talent (the ‘green skills gap’): LinkedIn data projects that nearly one-fifth of green jobs will be unfulfilled by 2030, and this figure rises to over half by 2050.¹¹ The green skills gap threatens progress on both economic and environmental fronts: undermining efforts to achieve carbon reduction targets and missing to the economic growth and employment opportunities that would result from the growing low-carbon economy. As such, there is an incentive to, at the minimum, double the global green talent pool through upskilling the workforce to meet the projected demand for green skills.

2.3.2 Green talent is in the greatest demand in the United Kingdom, where 13% of roles advertised on LinkedIn required at least one green skill.¹² However, while many young people in the UK are motivated to address climate change, they lack a clear understanding of the specific green skills and career

¹⁰ Nuala Burnett et al (2024). “The UK’s plans and progress to reach net zero by 2050” [Research briefing]. House of Commons Library. Available at: <https://commonslibrary.parliament.uk/research-briefings/cbp-9888/>.

¹¹ LinkedIn (2024). *Global Green Skills Report 2024*.

¹² LinkedIn (2024). *Global Climate Talent Stocktake*.

pathways needed for decarbonisation.¹³ As well as young applicants missing out on opportunities in the low carbon sector, this lack of knowledge and careers guidance contributes towards the broader risks associated with the sector not being able to meet its ambitious recruitment targets.

¹³ National Learning and Work Institute and WorldSkills UK (2022). *Skills for a net-zero economy: Insights from employers and young people* [Report].

3.0 POLICY DRIVERS

- 3.1.1 The UK has committed to a 68% reduction in emissions by 2030 (as part of its Nationally Determined Contribution towards the Paris Agreement) and to reaching net zero by 2050.¹⁴ To tackle power high prices, guarantee energy security and meet net zero targets, the Government has decided to accelerate the transition from fossil fuels and to domestically-produced renewable energy.¹⁵ To meet that ambition, installed solar capacity would need to increase almost threefold from a 2024 baseline. The UK Ten Point Plan for a Green Industrial Revolution sets out the government's plan to make the UK a global leader in green technologies, accelerate progress towards net zero, and create and support up to 250,000 green jobs through mobilising billions of public and private investment.¹⁶
- 3.1.2 The Clean Power 2030 Action Plan ('Clean Power 2030') is expected to play a key part in stimulating a wealth of new jobs and economic opportunities across the country. Clean Power 2030 sets out the UK's pathway to a clean power system and how the government will support the necessary infrastructure to deliver it. Clean Power 2030 aims to lower electricity costs (in a fair and equitable manner) across the country, while also growing public trust and knowledge in renewable energy, through driving investment into locally led, owned and managed energy developments.¹⁷ Clean Power 2030 would benefit employment, skills and supply chain through providing local people with new, higher value, future-proof jobs, and businesses with direct access to locally produced energy.¹⁷
- 3.1.3 Regional economic strategies also highlight renewable energy and clean growth as priority sectors. In May 2019, CWaCC declared a Climate

¹⁴ SOURCE

¹⁵ Invest 2035: the UK's modern industrial strategy. <https://www.gov.uk/government/consultations/invest-2035-the-uks-modern-industrial-strategy/invest-2035-the-uks-modern-industrial-strategy>

¹⁶ HM Government (November 2020). *The Ten Point Plan for a Green Industrial Revolution* [Policy Paper]. Available at: <https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution>.

¹⁷ Department for Energy Security and Net Zero (2024). Clean Power 2030 Action Plan.

Emergency and set a target for the borough to become net zero by 2045, noting that achieving this target will require the decarbonisation of industry and a rapid expansion of renewable and low-carbon infrastructure over the next decade. The Cheshire and Warrington Local Enterprise Partnership's *Strategic Economic Plan and Local Industrial Strategy* identify 'Energy and Clean Growth' as one of the region's core strengths and a driver of future prosperity, while at the same time recognising that the need for significant investment into local energy networks to meet future energy demand.

3.1.4 Industrial consumers in the North West produce 16.7 million tonnes of carbon emissions per year.¹⁸ Net-Zero North West's (NZNW) approach to decarbonisation has three objectives: an integrated industrial cluster in the north west, securing clean energy in the north west and creating the hydrogen eco-system.¹⁹ The Net Zero North West Cluster Plan (the 'Cluster Plan') outlines a plan to decarbonise industry and attract green investment through a £30 billion pipeline of low-carbon projects (including renewables, hydrogen, and carbon capture) in the Liverpool Bay and Cheshire area. The Cluster Plan is anticipated to save 46 million tonnes of carbon (including 17 million from industry) and create and safeguard 34,500 green jobs in the short-term and 660,000 over the long-term future.²⁰ The Cluster Plan identifies five key fronts for transformative change: energy efficiency, energy generation, investment, innovation, skills and the supply chain; and aims for the North West to become a leader in clean growth, as well as the world's first net zero region by 2040.²⁰

3.1.5 ORIGIN, led by CWaCC, proposes a similar vision a vision: "for Ellesmere Port to become the world's first Net Zero Carbon Industrial cluster".²¹ Similarly

¹⁸ Industrial Decarbonisation Research and Innovation Centre (IDRIC). *North West Industrial Cluster* [online]. Heriot-Watt University. Available at: <https://idric.org/stakeholders/north-west-cluster/> [Accessed 23 May 2025].

¹⁹ Net Zero North West & Siemens (2021) *The Net Zero North West Economic Prospectus*. Available at: https://api.netzeronw.co.uk/uploads/Net_Zero_North_West_Economic_Investment_Prospectus_1_926bbd64b8.pdf.

²⁰ Net Zero North West (2024). *Net Zero North West Manifesto: Pioneering a Net-Zero Future*. Available at: https://api.netzeronw.co.uk/uploads/manifesto_e4d6d5143e.pdf.

²¹ Ellesmere Port Economic Growth Team & Cheshire West and Chester Council (2023). *Origin* [online]. Available at: <https://www.origin-ep.co.uk/>. [Accessed 23 May 2025].

to the Cluster Plan, ORIGIN provides a blueprint to unlock £2 billion of capital investment aiming to encourage a network of world leading clean industry, power and transport companies to innovate new solutions to tackle the Climate Emergency, resulting in sustainable economic growth and the creation of a potential 30,000 of green jobs.²²

3.1.6 As well as creating renewable energy infrastructure, various stakeholders (including the government, industry and research institutions) have recognised the importance of green skills training to ensure the workforce possesses the appropriate skillsets to be able to fill in the roles that would be created as part of the energy transition. NZNW have noted that the development of appropriate skills in the workforce are crucial for the Cluster Plan to meet its goals, while at the same time noting- that closing the green skills gap is a complex issue, and closing it requires a coordinated effort from between stakeholders in government, educational institutions, and industry stakeholders.²⁰ In January 2025, CWaCC was awarded £1 million to fund green skills training (the 'Energy Skills Passport' programme) after the Government identified Cheshire as one of four regions critical for the growth of the clean energy sector.²³ The Energy Skills Passport programme aims to equip local workers with the skills necessary to take on the new green jobs that are being created.

²² Cheshire West and Cheshire Council. *Origin Ellesmere Port Investment Prospectus*. [online]. Available at: <https://www.origininvestmentprospectus.co.uk/> [Accessed 23 May 2025].

²³ Department for Energy Security and Net Zero, (2025). *Support for workers to benefit from thousands of clean power jobs*. [online] Available at: <https://www.gov.uk/government/news/support-for-workers-to-benefit-from-thousands-of-clean-power-jobs>.

4.0 POTENTIAL EMPLOYMENT BENEFITS

4.1 Encourage sustainable growth of the region's industrial sectors

- 4.1.1 The Proposed Development would provide the type of renewable energy infrastructure needed to meet the ambitions of decarbonisation and sustainable economic growth from the UK government and regional stakeholders in the Cheshire and Merseyside area. By inserting renewable energy infrastructure and low-carbon investment into an existing carbon-intensive industrial area, the Proposed Development aligns with NZNW' objective of "*creating an integrated industrial cluster in the north west*" and with the Cheshire and Warrington Local Enterprise Partnership's *Strategic Economic Plan and Local Industrial Strategy* (3.1.3 and 3.1.4).
- 4.1.2 The addition of a utility-scale solar farm and battery energy storage system ('BESS') to the existing technologies would improve the region's technological diversity, helping make the North West a renewable energy pioneer in the UK and a centre for green jobs.
- 4.1.3 By providing renewable energy to homes and businesses in the Cheshire and Merseyside areas, the Proposed Development aligns with NZNW's objective of "securing clean energy in the north west". Using locally produced electricity, as opposed to gas or energy from the grid (which contains a mixture of fossil fuels and renewable energy), would also reduce greenhouse gas emissions produced in the region without impacting regional productivity. These outcomes support Net Zero North West's vision to become the world's first net zero industrial cluster by 2040.
- 4.1.4 Access to affordable and reliable energy is an influential determinant of business competitiveness, and an important consideration for internationally mobile investment. Important sectors in the region, such as advanced manufacturing and digital and technologies, have cited electricity costs as a barrier to growth. The Proposed Development would help shield businesses from volatile international fossil fuel markets.

- 4.1.5 The Proposed Development includes provision for a private-wire connection to energy-intensive local industry. This would provide local industry with home-grown and sustainably generated electricity at a cheaper price (relative to sourcing from the grid), promoting business growth, economic competitiveness and potentially allowing them to employ more people, thereby reducing unemployment levels and potentially providing local people with the skills required to full-fill these newly created roles.
- 4.1.6 This opportunity which is bespoke to the Proposed Development is an additional benefit, supplementing the conventional arrangement which will see the electricity generated by the solar farm being exported onto the local distribution network from where it will be supplied to users, including homes and businesses. This will provide economic benefit in the context that generating most of the UK's electricity supply from home-grown and renewable sources, such as wind and solar, as opposed to being reliant on international gas prices, will reduce energy bills for everyone in the long-term.
- 4.1.7 The contribution of the Proposed Development to carbon reduction enhances the borough's appeal for investors and businesses, as companies are prioritising clean energy availability for location decisions. The Proposed Development could attract businesses looking to power their facilities with renewable electricity or to site themselves near sources of clean energy (for instance, advanced manufacturing or data centres seeking renewable power purchase agreements). In this way, the Proposed Development could indirectly result in further job-creation locally by improving infrastructure for sustainable growth.

4.2 Provide employment for local people

- 4.2.1 The Proposed Development would provide employment across a variety of sectors and skills levels, potentially including engineering, design, welding, mechanical trades, and managerial roles (such as project and delivery managers).

4.2.2 The Applicant will strive to maintain or improve revenue and employment for the ten most significant employment sectors in the authority (as identified by CWaCC and listed in 2.2.1). It is expected that the Proposed Development would contribute, directly or indirectly, to the growth of most of these sectors. For example, new jobs would be created in the construction and logistics sectors, relating to the construction and operation of the proposed SADA, BESS and balance of plant works (e.g. new access tracks).

4.2.3 The SADA, NBBMA and SMA sub-areas could contribute to the burgeoning local green skills sector through providing employment, education and training opportunities to surrounding communities, related to solar energy, BESS, and environmental conservation. Meanwhile, the hospitality and retail sectors in surrounding towns could benefit from increased customers, owing to the influx of workers during the construction period. Once operational, the Proposed Development may still result in modest benefits to these sectors, resulting from interest groups, as well as operations and maintenance workers visiting the Proposed Development.

4.3 Construction phase

4.3.1 It's estimated that approximately 109 full time (or equivalent) jobs would be created over the construction period, which is expected to last approximately 30 months. Employment opportunities would include civil and electrical engineering, groundworks, landscaping, transportation, security services and consultancy services.

4.3.2 The Applicant aims to prioritise procuring the services of local businesses and contractors and the use of local employees, where possible. For example, a local storage facility located in Ellesmere Port has already been used for storage of equipment, as part of pre-construction works. Furthermore, a local contractor was also used for the installation of fencing to secure the equipment once it was installed.

4.3.3 The principal work packages during construction will comprise of the following:

- i) Enabling Works
- ii) Construction of Western Array
- iii) Construction of Eastern Array
- iv) Construction of the BESS and Frodsham Solar Substation
- v) Construction of the 132kV SPEN Substation Grid Connection
- vi) Construction of the 132kV Private Wire Grid Connection

A full description of the development proposals is contained in **ES Vol 1 Chapter 2: Proposed Development [EN010153/DR/6.1]**.

4.3.4 It is anticipated that the average number of workers on site across the construction phase would be 109 per day, with a peak workforce of approximately 243 staff per weekday in the twelfth month. The workforce would be distributed across the Site with work happening in parallel across the sub-projects and packages described in 1.3.4.

4.3.5 The Proposed Development includes installation of perimeter fencing around all the solar array areas, which would be a significant undertaking and particularly well suited to be undertaken by local contractors, given the presence of various construction businesses in the borough of Cheshire West and Chester.

4.3.6 The temporary jobs created during the construction phase of the Proposed Development would support the career growth of those employees by providing them with relevant work experience in the green skills sector, allowing them to take on future green jobs in the region.

4.4 Operational phase

4.4.1 Once operational, the Proposed Development would support a number of permanent jobs and long-term contracted positions over its operational life of approximately 40 years.

4.4.2 Most of the jobs created would relate to the ongoing operations, maintenance, and security of the solar PV and BESS facility, as well as landscaping/grounds maintenance. For example, inspection and cleaning of solar panels, operation of security systems, and vegetation/grounds maintenance. The Applicant will encourage local businesses to participate in the tender for the operation and maintenance phase of the project and will communicate details on how they can do that at the appropriate time.

4.5 Conservation and Environment

4.5.1 The NBBMA and SMA areas of the Proposed Development would require ongoing management, maintenance and monitoring after their initial construction. This would result in the creation of jobs related to conservation and landscaping, which aligns with CWaCC's ambition to grow the local land use and climate change mitigation sector.⁹

4.5.2 Given that 5,500 people are working in the 'Green skills – Land Use and Climate Change Mitigation' sector in Cheshire and Warrington,²⁴ there is a large pool of local workers which can be considered for some of these roles. The habitat improvement measures would include nearly 15km of tree and hedgerow planting to boost biodiversity on site, which would be a job suitable to be undertaken by a local contractor.

4.5.3 These newly enhanced habitats are expected to require the services of an environmental management company or nature charity to ensure their long-term effectiveness. The Applicant would consider location as a selection criterion for this contractor; ensuring that said entity has the required specialist

²⁴ Cheshire West and Chester Council & NHS (2023). "Green skills – Land Use and Climate Change Mitigation Overview". "Important Areas of Employment in Cheshire West and Chester" - *Live Well Cheshire West*. Available at: <https://www.livewell.cheshirewestandchester.gov.uk/Information/Employment-areas-in-Cheshire-West-and-Chester> [Accessed 19 May 2025].

and local knowledge will also be important for the success of these habitats and the species they support.

4.5.4 There will also be a requirement for long term ecological monitoring of the site and the Applicant will seek to prioritise procuring such services from environmental specialists in the Cheshire and Merseyside area. For example, the Applicant has already engaged the services of Avian Ecology (based in Cheshire) for ornithological and ecology services.

4.5.5 Additionally, the Applicant proposes to reach out to local research groups and academics from the nearest universities, with a view of these habitat projects being available to be used for research and education purposes and thereby providing added value to local institutions. This proposal is elaborated on in 7.6 of the plan.

4.5.6 The Proposed Development includes the creation of over 4.5 km in new permissive paths to improve public access to across site. These would also require regular maintenance such as cutting verges to prevent vegetation overgrowing onto the paths, which could provide work for local grounds maintenance contractors. A full description of the proposals related to public rights of way is contained in the **Outline Public Rights of Way Management Plan [EN010153/DR/7.9]**.

4.6 Providing a stimulus for local businesses

4.6.1 The influx of construction activity during the construction phase is expected to benefit local businesses (such as equipment suppliers, transport and logistics firms, and hospitality venues for workers), providing a temporary economic stimulus. It's expected that a collection and drop-off service using minibuses will be implemented as a way of transporting construction workers to site. This service will facilitate the transportation of construction staff to and from pre-arranged collection and drop-off points, which may include nearby public transport hubs, town centres, and accommodation facilities. By increasing footfall in these areas, this service has the potential to generate

additional revenue for local high street businesses, as construction workers may patronise local shops and services.

5.0 SKILLS BENEFITS

5.1 Enhancing proficiency in green skills

5.1.1 Interventions relating to relevant skills training and education would benefit local people, while also promoting the supply of an appropriately skilled workforce to deliver the project. In the UK, the hiring rate for green talent is 72% greater than for overall talent.¹² Furthermore, construction, utilities and manufacturing (as well as being important employment sectors in Cheshire) are the sectors with the highest demand for green skills, with 23.1%, 20.6% and 13.2% of LinkedIn job postings in each sector, respectively, requiring green skills.¹² As such, through providing training opportunities and work experience relating to green skills (especially within the construction and utilities sectors), the Proposed Development has the potential to significantly improve the hiring prospects of local workers.

5.1.2 The Applicant will work with the partners set out in Table 1-1 to explore ways in which the Proposed Development could help to address the green skills gap. A proposed initiative to address this issue is outlined in 7.3 of the Plan.

5.2 Supporting Research, Innovation and Education

5.2.1 It's the aim for the benefits of the Proposed Development to go beyond its primary purpose as critical infrastructure. This includes by it providing a resource for the purpose of research and education in the renewable energy and environmental sectors, thereby supporting innovation and conservational and contributing towards wider environmental and industrial targets. More focused research programmes by higher education facilities could also be accommodated. Potential avenues through which the Applicant can achieve these objectives are outlined in 7.5 and 7.6 of the Plan.

5.2.2 Should the Proposed Development be consented, the Applicant would support STEM education in the local area through collaborating the local education stakeholders listed in Table 1-1. The Applicant already has plans to engage with STEM Learning UK. The Applicant has the right people to

support STEM education, as one member of the team is a registered STEM ambassador, while another is a former university lecturer.

5.3 Funding

5.3.1 The Proposed Development will generate business rates revenue over its operational lifetime, to be paid to the local authority. This revenue could be invested in the authority's established skills and training programmes, making a notable contribution to achieving objectives. The revenue could supplement the £1 million that CWaCC was awarded in January 2005 to fund green skills training under the 'Energy Skills Passport' programme.

5.3.2 The 'Frodsham Community Fund', although not a matter to be taken into account in the planning balance, will also take some of the revenue generated by the Proposed Development and make it available to support community initiatives. This funding will be into the millions of pounds over the life of the project, and community groups may be able to apply for funding to support skills and training initiatives in the local area.

6.0 SUPPLY CHAIN BENEFITS

6.1 Enforce high traceability and sustainability standards across the supply chain

6.1.1 The Applicant is part of Cubico Sustainable Investments Limited ('Cubico'). As such, all suppliers, joint venture partners, sellers, developers, consultants, contractors and other types of third parties ('Suppliers') engaged to provide goods and services for the Proposed Development must adhere to Cubico's Supplier Code of Conduct ('SCoC') (**Appendix A**) and promote the same standards within their own organisations and their supply chains. Suppliers are expected to maintain policies and procedures which ensure they meet the standards contained within the SCoC. The Applicant will seek assurance from its Suppliers that they comply with this Code as part of the tendering process and through periodic compliance reviews.

6.1.2 The Applicant expects their Suppliers to comply with the following principles in particular:

- i) Respect for human rights
- ii) Prioritise health, safety and environment ('HSE')
- iii) Compliance with environmental legislation
- iv) The right to speak up

6.1.3 The Applicant's Procurement and Know Your Customer (KYC) Policy (**Appendix B**) sets high standards for ethical and responsible practice, which applies to all of its employees and third parties and would therefore be applied to the Proposed Development. This policy prohibits the use of modern slavery in all of the Applicant's own operations and supply chains, ensuring the Proposed Development does not benefit (either directly or indirectly) from any practices amounting to modern slavery. Employees and suppliers are required under the Procurement and KYC Policy to understand the business needs, resolve queries satisfactorily, demonstrate fairness and integrity,

- comply with relevant laws and regulations, keep relevant information confidential and secure, and be responsible for procurement best practice.
- 6.1.4 The Applicant's procedure for monitoring Suppliers involves an initial compliance check to screen for red flags using an external software (Moody's Compliance Catalyst). The chosen Suppliers are then monitored on a daily basis, and the Applicant would receive an email alert if a new compliance red flag is discovered. This ensures the Applicant will become aware of any compliance breaches within 24 hours.
- 6.1.5 The Applicant's 'Speak Up Procedure' (**Appendix C**) encourage employees and third parties to report any unethical business practices or violations of any policy within its own business or by Suppliers. The Speak Up Procedure provides multiple ways for a report to be made by contacting a manager, Cubico compliance, or using the independent service provided by Safecall to make reports anonymously. This provides multiple avenues for internal and external people to report concerns, including modern slavery in the supply chain. The Applicant's Speak Up Procedure encourages employees to report wrongdoings, while the Applicant's Code of Conduct makes it clear that taking negative action against an employee for having sent a Speak Up report is strictly prohibited. For further information, please see the 'Whistleblowing' webpage on Cubico's website.²⁵
- 6.1.6 The Applicant would aim to reduce carbon emissions throughout the supply chain for the Proposed Development, as far as practical. The Applicant would consider the carbon emissions of potential Suppliers during the tender process and would encourage preferred Suppliers to have a carbon reduction plan through including this as a selection criterion.

²⁵ Cubico Sustainable Investments. *Whistleblowing*. Available at: <https://www.cubicoinvest.com/esg/whistleblowing/> [Accessed 23 May 2025].

6.2 Encourage procurement activities to benefit the local economy

- 6.2.1 Through generating and exporting energy locally, the Proposed Development would support regional self-sufficiency, thereby reducing reliance on outsourcing and fostering sustainable economic growth. For instance, the proposed private-wire connection (described in 7.1 of the Plan) will enable some of the high electricity demand from local industrial businesses to be met with electricity generated locally and sustainably by the Proposed Development.
- 6.2.2 Wherever possible, the Applicant would seek to procure the services of local businesses. The Applicant has already engaged the services of local consultancies and contractors as part of the design and environmental assessment processes.
- 6.2.3 Should the Proposed Development be consented, the Applicant would aim to include qualified local suppliers within the selection pool during tender processes. The Applicant would include social value as a selection criterion (which could include commitments to local employment) and would thus incentivise the winning bidder to partner with, or subcontract to, local businesses.
- 6.2.4 The Proposed Development also complements other clean energy initiatives in the area (such as the existing Frodsham Wind Farm and the emerging HyNet hydrogen project), helping to form a cluster of low-carbon energy assets in the area. Such clustering can yield synergies, spur innovation, and support supply-chain development – all hallmarks of a growing green economy.

7.0 INTERVENTIONS AND OPPORTUNITIES FOR COLLABORATION

7.1 Private-wire connection to local industry

7.1.1 The Proposed Development's immediate proximity to complementary infrastructure and demand centres enables the possibility of its direct integration into local networks through a private-wire connection. This allows the Proposed Development to supply renewable electricity directly to energy-intensive local industries at cheaper prices relative to the grid, thus reducing their energy costs and freeing up capital for business growth and employment.

7.2 Collaborate with inclusive organisations to ensure inclusive hiring practices

7.2.1 The Applicant is committed to improving diversity and inclusion in the workforce through inclusive training and hiring practices. The Applicant proposes collaborating with local stakeholders working to improve diversity. This could include collaborating with CWaCC (who were awarded the Disability Confident Employer standard) to ensure disabled people are included in the hiring process, and appropriate accommodations are made.

7.2.2 The Applicant would also consider advertising some opportunities related to the Proposed Development on job boards specifically targeting minority groups of people. For example, Cubico has already collaborated with Ambitious About Autism to provide internship opportunities for young autistic people within the company and worked out how best to support these interns.

7.3 Coordinate green skills training with local education and skills providers

7.3.1 The Applicant proposes to engage with the local educational providers set out in Table 1-1 to explore the ways in which the Proposed Development could be used to deliver training to young people and unemployed adults, to help them develop the skills needed to fill the green jobs being created as part

achieving Net-Zero. In particular, the Applicant would like to explore the idea of delivering training in schools located in low-income areas with the aim of contributing to the social mobility of economically disadvantaged children and inspiring them to consider a career in the renewable energy sector.

- 7.3.2 The Applicant plans to participate in career training events. For example, the Applicant has already committed to attending the STEM Symposium at Chester Zoo, on 30th June 2025, where the Applicant would support STEM curriculum leaders and teachers across Cheshire and Warrington with integrating industry-relevant skills and experiences into their curriculum planning. This intervention would improve young people's knowledge about green skills, through receiving quality careers guidance from schools, thus empowering young people to pursue a career in the low-carbon sector and contributing towards closing the green skills gap.

7.4 Target job adverts to locally trained workers

- 7.4.1 The Proposed Development could provide employment to local workers trained under the Energy Skills Passport programme, which would give them the opportunity to put their new green skills into practice. The Applicant proposes liaising with CWaCC to find the best way to ensure that any jobs adverts are seen by these workers, and will agree this as part of the final Plans for the construction and operation phases.

7.5 Permit educational visits to the site

- 7.5.1 The Applicant proposes to install information boards along the existing and new permissive footpaths that provide relevant information relating to solar power, BESS and ecological conservation. In addition, the Applicant will seek to facilitate organised visits to the solar farm and, where appropriate, to the enhanced natural habitat areas. It is envisaged that such visits would be hosted by trained operations staff, allowing visitors to learn about the electrical engineering of solar power generation and the ecology supported by onsite habitats. The Applicant would consider inviting groups from local

schools and colleges in particular, with the aims of educating students about renewable energy and nature conversation and inspiring them to consider a green career path.

7.6 Support research on habitat improvement

7.6.1 The Proposed Development provides the opportunity for researchers to evaluate the effectiveness of habitat improvement measures through monitoring bird populations in the NBBMA and SMA throughout the life cycle of the development. Through this, researchers would be able to conclude the effectiveness of the habitat mitigation measures.

7.6.2 The Applicant proposes to build on an existing relationship with the RSPB and collaborate with local University researchers, facilitating site access for the purpose of monitoring the habitats and bird populations in the NBBMA and SMA. This research can provide vital information for future conservation projects, through allowing researchers to conclude on what has been effective and what can be improved on the project. The output of this research, if applied by other developers, can contribute to improving biodiversity and bird populations, helping to tackle the UK's biodiversity crisis. As part of their commitment to environmental improvement, the Applicant has consulted with Natural England and agreed to take on a flexible approach to habitat management, where they would adapt their practice in response to research and expert recommendation. This provides researchers with the opportunity to measure the impact of changes made on biodiversity.

8.0 TIMELINE

- 8.1.1 Subject to obtaining the necessary consents, construction is anticipated to commence in early 2028 and be completed in mid-2030. The Proposed Development comprises a temporary development with an operational phase of up to 40 years. Decommissioning activities would therefore commence in 2070, 40 years after final commissioning.
- 8.1.2 Pursuant to the Requirements of the DCO, the Applicant will engage with relevant partners to turn this outline plan into a full plan. The full Plan would be prepared in a two phases: the first (relating to the construction phase) would be produced prior to the commencement of the authorised development and the second (relating to the operation phase) would be produced prior to commencement of operation of the SADA.

9.0 MONITORING AND FEEDBACK

9.1.1 It is important that the objectives and activities of the Plan are effectively monitored, measured and reported. This enables an understanding of whether the Plan is achieving its goals and contributing to the over-arching vision and provides feedback accordingly. The monitoring and reporting plan will be developed as part of the full Plan, which will include a periodic review with CWaCC. Due to the different opportunities presented during construction and operation, the timing for these periodic reviews will be agreed as part of the full Plan.

Appendix A – Cubico Supplier Code of Conduct



Cubico
SUSTAINABLE INVESTMENTS



Supplier Code of Conduct

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SECTION 1

Cubico's Values

The Cubico Sustainable Investments Group (**"Cubico"**) is committed to the ethical and sustainable conduct of business and we pride ourselves on being a reputable and honest business. We have made that commitment with the strong support of our shareholders.

Our shareholders, business partners and the communities in which we work expect us to behave in a responsible manner. This means not only complying with the laws of the countries in which we operate but also aiming for best practice in everything that we do. These values apply regardless of whether local laws are enforced consistently, and regardless of whether others in the industry share them or not.

Cubico is a member of the UN Global Compact. We incorporate the Ten Principles of the UN Global Compact into our strategies, policies and procedures, and establish a culture of integrity to meet our fundamental responsibilities in the areas of anti-bribery and corruption, human rights, labour, and environment.

SECTION 2

Application of this Code

We view our suppliers as an extension of our own team, and so the manner in which they conduct their business naturally reflects upon us. As such, it is important to that our suppliers are committed to upholding our high ethical standards.

This Code covers suppliers, joint venture partners, sellers, developers, consultants, contractors and other types of third parties engaged to provide goods and services to or on behalf of Cubico (**together, "Suppliers"**) and is a formal statement

of the values, and fundamental principles we expect from them.

We request our Suppliers to adhere to this Code and to promote the same standards within their own organisations and their supply chains. We expect our Suppliers to maintain policies and procedures which ensure they meet the standards contained herein. Cubico will seek assurance from its Suppliers that they comply with this Code as part of the tendering process and through periodic review of compliance.





SECTION 3

Anti-Bribery and Corruption

Cubico expects its Suppliers to act ethically and transparently in all circumstances and maintain appropriate controls to ensure this.

In particular, we entirely reject bribery and corruption as a way of doing business. Suppliers must not give or receive bribes of any sort, or allow others to give or receive bribes on their behalf, or engage in any other kind of corrupt activity.

In particular, Suppliers shall:

- not directly or indirectly offer or pay bribes;
- not directly or indirectly request, agree to receive or accept bribes;
- not directly or indirectly give advantages to public officials to influence them in their official capacity;
- ensure gifts and hospitality given or received are reasonable, proportionate and only so far as necessary;
- avoid conflicts of interests or potential conflicts of interests;
- not make or approve charitable or political donations to obtain or retain a business advantage;
- maintain accurate and complete financial records;
- screen the backgrounds of the people they work with to ensure they act ethically and with integrity; and
- maintain appropriate whistleblowing channels so that concerns can be escalated within their organisation.

SECTION 4

Respect for Human Rights

Cubico expects its Suppliers to observe and ensure, at all times, human rights compliance. In particular, the following principles shall be complied with:

Voluntary employment: Workers¹ shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime. All work must be carried out voluntarily and there shall be no mental or physical coercion to work. Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice in accordance with applicable laws and collective agreements, and without the imposition of any improper penalties.

No confiscation of property: Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment, and the withholding of property shall not be used directly or indirectly to restrict Workers' freedoms or to create workplace slavery.

Charging of fees: Fees or costs associated with the recruitment of Workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to Workers whether directly or indirectly. Similarly, Workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.

Written terms of employment: Workers shall have the terms of their employment or engagement set out in a written document that is easily understandable to them and which clearly sets out their rights and obligations. This written document shall include, but not be limited to, transparent terms with respect to wages, overtime pay, payment periods, working hours and rights in respect of rest breaks and holiday. Such written terms shall be provided to the Worker in advance of them starting work, shall be honoured by the employer and shall meet industry standards and the minimum requirements of applicable laws and collective agreements where the work is carried out.

¹ "Worker" means any individual who is employed or engaged by you to provide work or services (whether that individual is directly engaged by you or engaged via a third party, such as an employment agency used by you).



SECTION 4 - CONTINUED...

Payment: Wages should be paid regularly and directly to the Worker and in legal tender. Methods of payment that have the effect of depriving the Worker of the ability to terminate employment are prohibited.

No child labour: There shall be no use of child labour. Nobody shall be employed under the minimum age. Subject to the overriding prohibition on the use of child labour, if Workers under the age of 18 are employed then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.

No harsh or inhumane treatment: Workers, their families and those closely associated with them shall not be subject to harsh or inhumane treatment including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation. Migrant Workers, their families and those closely associated with them should not be subject to discrimination due to their nationality.

Complaints by Workers: Workers shall be free to file grievances to their employers about the employer's treatment of them and Workers shall not suffer detriment, retaliation, or victimisation for having raised a grievance.

Freedom to move: Workers shall be free to move without unreasonable restrictions and shall not be physically confined to the place of work or other employer controlled locations (for example accommodation blocks) nor shall they be confined by more indirect means. There shall be no requirement placed on Workers that they take accommodation in employer controlled premises except where this is necessary due to the location or nature of the work being performed.

Use of third party labour: Where it is necessary to recruit Workers who are engaged via a third party, such as an employment agency, then only reputable employment agencies shall be engaged. Where Workers are sourced to be employed directly, only reputable recruitment agencies shall be engaged. All such agencies must have the necessary licences and registrations under local laws.

SECTION 5

Health, Safety and Environment

The health and safety of our own employees and of Workers is paramount. Cubico expects its Suppliers to operate work environments that promote the health, safety and wellbeing of Workers and which strive to create injury-free workplaces.

In particular, Suppliers shall:

- ensure a healthy and safe working environment;
- ensure that Workers and others engaged in the supply chain are adequately trained and provided with the proper equipment and working procedures to carry out their work safely;
- recognise that all Workers have a right and an obligation to raise health and safety concerns and to cease working if they feel it is unsafe to continue;
- report all health and safety incidents related to our project sites and in our workplaces;
- recognise the special needs of vulnerable Workers and ensure that their work and the conditions in which they are required to work create no direct or indirect physical, mental or other risk. Workers may be considered vulnerable due to their age (under 18's), their ability, pregnancy or otherwise;
- understand the risks to which their Workers are exposed and provide suitable and sufficient mitigation of those risks; and
- ensure that emergency preparedness arrangements are adequate for their Workers at our project sites and in our workplaces.



SECTION 5 - CONTINUED...



Cubico recognises its responsibility towards the environment and society and we are committed to operating our business in an environmentally and socially responsible manner to protect natural resources and continually improve our environmental performance.

Cubico expects its Suppliers to prioritise sustainable and socially responsible development and maintain appropriate mechanisms to assess and mitigate the impacts it operations may have on the environment.

In particular, Suppliers shall:

- comply with all applicable environmental legislation;
- integrate the principles of social and environmental responsibility and sustainability in their operations;
- keep an open and preventive approach to environmental challenges;
- seek to implement, develop and disseminate environmentally friendly responsible technologies; and
- promote the integration of policies, procedures and practices which take care of the environment in all management areas of their operations.

SECTION 6

Reporting Wrongdoings

Cubico is absolutely committed to upholding the values and requirements set out in this Code. If a Supplier has concerns or witness any wrongdoing, we encourage them to share that concern with us. They can do that by sending a report, in confidence, to Safecall, our external, independent whistleblowing provider, at www.safecall.co.uk/report.

Report your Concerns in Confidence





We are working to support the:

**SUSTAINABLE
DEVELOPMENT
GOALS**



Appendix B – Cubico Procurement and KYC Policy



APPENDIX B

Cubico Procurement and KYC Policy

1. Objective

- 1.1 Cubico Sustainable Investments GP 1 Limited operates in a number of countries around the world, directly or through its indirect subsidiaries (together “**Cubico**”), including various operating project companies in which we directly or indirectly own an interest.
- 1.2 Our shareholders, business partners and the communities in which we work expect us to behave in a responsible manner. This means not only complying with the laws of the countries in which we operate but also aiming for best practice in everything that we do. These values apply regardless of whether local laws are enforced consistently, and regardless of whether others in the industry share them or not. We are committed to ethical and responsible practice. The standards our people expect of themselves and of one another are very high, and reflect the nature of our business, and our place within it.
- 1.3 Each year we spend millions of dollars purchasing goods and services that help our business activities run smoothly, ensuring that we deliver on our commitments and add value to Cubico. It is important that we have a commitment to good business and conduct it in line with this Policy and Cubico’s other policies.
- 1.4 In the course of our business, we engage with suppliers, joint venture partners, sellers, developers, acquisition targets and other types of stakeholder (“**Business Partners**”). In certain circumstances, Cubico could face civil or criminal legal liability for the misconduct of our Business Partners. It is therefore very important that we only work with Business Partners that share our values, are suitably skilled and have been vetted in accordance with this Policy.

2. Scope

- 2.1 This Policy applies to all employees of Cubico and to Third Parties and explains:
 - 2.1.1 your responsibilities during the course of your involvement in procurement activities, enabling you to observe and uphold our business principles; and
 - 2.1.2 Cubico’s approach to vetting Business Partners.

3. Application and Responsibilities

- 3.1 Cubico is a principled business as a direct result of every single employee conducting themselves with integrity. Employees of Cubico and consultants, contractors and third parties involved in procurement on behalf of the Group or representing Cubico (“**Third Parties**”) have a responsibility, wherever they work in the world, for operating our activities responsibly and with integrity, treating customers, partners and suppliers fairly and professionally and for conducting our



business in compliance with law.

- 3.2 Complying with this Policy will enable you to maintain proper standards of fairness and integrity in business relationships with your colleagues and Third Parties, as well as ensuring we only work with Business Partners who share our values, are suitably skilled and qualified to work with us.
- 3.3 If you make a request for improper payment, or Cubico sees that you might be engaging in fraudulent activities or making corrupt payments or intend, or plan, to violate any applicable anti-bribery and corruption laws, we will report you to the relevant authorities in addition to any internal disciplinary action. Similarly, if you receive an approach for you to receive an improper payment, then this should immediately be reported to Cubico Compliance.
- 3.4 Part of maintaining proper standards of fairness and integrity includes ensuring that our business is truly sustainable and does not engage in or benefit from (whether directly or indirectly through our supply chain), practices amounting to modern slavery. “Modern slavery” is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Modern slavery is a crime and a violation of fundamental human rights. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Cubico prohibits the use of modern slavery in our own operations and supply chains. It is the responsibility of our employees to be vigilant to the risks of our suppliers and other business partners engaging in or benefitting from (whether directly or indirectly) practices that amount to modern slavery and to raise any concerns with Cubico Compliance.
- 3.5 EXCOM is responsible for ensuring that the procedures set out herein are effectively implemented.
- 3.6 If you have any questions regarding this Policy, please direct them to Cubico Compliance [Olga Garcia (Olga.Garcia@cubicoinvest.com) and Jonathan Blacker (Jonathan.Blacker@cubicoinvest.com)] (“**Cubico Compliance**”).

4. Procurement Responsibilities

- 4.1 As an employee or Third Party of Cubico, you are responsible for undertaking the procurement process in line with the Group’s policies and procedures. You should ensure you understand the business needs, resolve queries satisfactorily, demonstrate fairness and integrity, comply with relevant laws and regulations, keep relevant information confidential and secure, and be responsible for procurement best practice.
- 4.2 To do this, you will:
- 4.2.1 only authorise or sign contracts and purchase orders up to the approval limit assigned to you in the Chart of Authority relevant to the purchase or contract and seek all required approvals under the Chart of Authority prior to



signature;

4.2.2 not delegate your payment authority to anyone with a lower limit than you;

4.2.3 not combine financial authorities, (i.e. you and another manager with an approval limit of US\$50,000 cannot combine your limits to approve an order of US\$100,000); and

4.2.4 not divide purchase orders, e.g. you will not split a known commitment for US\$100,000 into three smaller purchase orders to avoid referral to a higher level of approver.

5. Purchasing on behalf of Cubico

5.1 You must follow purchasing best practice and not approve expenditure through any purchasing channel where it may be considered a personal interest exists. Purchases or contracts should not be made via intermediaries, but directly with the organisation providing the goods or services. Where this is not possible then approval should be sought from Cubico Compliance before a commitment for goods or services is made.

6. Use of Corporate Credit cards to procure goods and services

6.1 You should only use a Cubico corporate credit card to buy goods and services on behalf of Cubico below a maximum single transaction value and for categories of spend as set out in the Travel and Expenses Policy. The monthly cumulative limit will be advised to and agreed by each employee at time of issue of the corporate card.

6.2 You should not use a corporate credit card for goods and services where separate ordering arrangements with preferred suppliers exist. Corporate cards must not be used for paying any contractors or third parties providing services without the approval of Cubico Compliance.

7. Engaging with suppliers

7.1 You will treat our suppliers with fairness. You will request that they respect our Business Principles and make it clear to them that we do not tolerate bribery, corruption, fraud or modern slavery.

7.2 Where new suppliers and Business Partners are being engaged, you must ensure appropriate vetting has been conducted in accordance with clause 14 of this Policy.



- 7.3 You should negotiate effectively to gain competitive benefits, improved quality and service, security of supply and regulatory compliance on purchases, and not discriminate when selecting suppliers.
- 7.4 Sourcing decisions should be decided on consistent criteria across all suppliers. Always place our business with the best value, qualified suppliers, making total acquisition cost along with the ability to meet our legal, regulatory and HSE requirements the main considerations. In particular, you should ensure that there is no evidence of modern slavery, fraud or bribery and corruption in our supply chain.
- 7.5 You must make sure a non-disclosure agreement (NDA) is signed before exchanging any confidential information and disclose any potential conflicts of interest to Cubico Compliance and your line manager before sourcing or market testing occurs.
- 7.6 You must use a competitive process when engaging suppliers in accordance with the Global Procurement Procedures.
- 7.7 You must also:
- 7.7.1 develop evaluation criteria to support the supplier selection process before supplier proposals are received;
 - 7.7.2 involve Cubico Legal or an external law firm in the review of all contracts for purchases or services unless:
 - (i) the proposed contract is a Cubico standard form and there have been no material deviations from that form; or
 - (ii) the proposed terms (a) have previously been approved by Cubico in relation to a contract for the same or similar goods and/or services, and there have been no material deviations from that form or (b) are standard terms for the type of goods and/or services being procured;provided that, in both cases:
 - (A) the total fee/charge payable by Cubico under the proposed contract does not and cannot exceed USD 50,000, and the total cap on liability is also capped at the same amount;
 - (B) the contract does not deviate from Cubico's policies or guidelines on contracts, in issue from time to time; and
 - (C) the contract is not considered high risk from an operational, legal and regulatory, financial or reputational perspective;
 - 7.7.3 manage the daily supplier relationship;



7.7.4 ensure suppliers agree to:

- meet Cubico's guidelines on Corporate Responsibility;
- comply with Cubico's Supplier Code of Conduct; and
- meet Cubico's key values and other relevant regulations;

7.7.5 ensure the template ABC, Modern Slavery and Sanctions clauses in Appendix A or equivalent clauses are included in contracts where reasonably required;

7.7.6 ensure you have secured all relevant internal approvals and a contract or purchase order has been signed before spend is committed to suppliers;

7.7.7 not allow contractors to sign any contracts or authorise purchase orders on behalf of Cubico; and

7.7.8 where relevant, ensure that the appropriate insurances are held where a supplier is entering Cubico facilities & undertaking work on behalf of Cubico.

8. Payment Terms

8.1 Cubico's standard payment terms are 30 days from receipt of an approved invoice. All contracts should clearly reflect Cubico's standard payment terms.

8.2 All suppliers should be requested to provide confirmation of their bank account details for invoice payments. This can either be embedded in the body of the contract, or sent on the supplier's official company letterhead and signed by their finance manager and sent for the attention of the relevant Cubico Country Finance Manager. Any changes to the nominated bank account details should be notified either by contract amendment or by a new letter sent to the relevant Cubico Country Finance Manager.

9. Evergreen & Multi-Year Contracts

9.1 Contracts and purchase orders should not be entered into on an evergreen basis (i.e. automatically renewing). Certain multi-year contracts with a large value will require approvals in line with the chart of authority, but will also require the approval of the Board of Directors or the CEO under the CEO Delegation of Authority for Material Contracts (as the case may be). Cubico Legal should be consulted at an early stage to ensure required internal approvals can be secured.



10. Taxation

- 10.1 Any contracts with a value of more than US\$250,000 should be reviewed by the Tax Director. Where the contract is for more than US\$100,000 and is cross border and/or contains a tax clause which has a gross up clause for any withholding tax which would have been suffered by the supplier, then the Tax Director should also be consulted.

11. Audit Clause

- 11.1 For purchases or contracts over US\$100,000 then a right of audit clause should be included within the contract which gives Cubico the right, upon proper notice to the contractor, to undertake an audit of the contractor to ensure that it is in compliance with the terms and conditions of the contract and that it has appropriate controls and processes in place. A template right of audit clause can be found in Appendix A.

12. Supplier IT and Data Security

- 12.1 Information security arrangements of third party suppliers with whom Cubico will be sharing information (such as commercially sensitive, HR, payroll and accounting records) should be formally considered as part of the supplier take-on and due diligence process.
- 12.2 This should include a minimum set of third party assurance documentation (such as ISAE 3402, SOC1 or ISO 27001 or PCI accreditations, and external security penetration testing results) that third-party suppliers must be required to provide as evidence of their data security arrangements.
- 12.3 These assurance reports and accreditations need to be reviewed internally to analyse whether these provide enough details on the security controls deployed by the third party suppliers and their alignment with Cubico's needs considering the data transferred/hosted and the service outsourced.
- 12.4 Where third party supplier accreditations are not available, Cubico should analyse how assurance and continuous monitoring will be obtained over key security controls to ensure Cubico data is secure.

13. Record Keeping, Internal controls and audit

- 13.1 All aspects of the business are subject to regular audits of internal control systems on a risk-based approach and provide assurance that applicable systems and controls are effective in meeting our procurement needs.



14. Vetting of Business Partners

- 14.1 As an employee of the Cubico, you are responsible for requesting appropriate vetting of Business Partners based on the below guidelines and taking account of risks including financial stability, anti-bribery and corruption compliance, fraud, modern slavery compliance, corporate responsibility, HSE and ESG.
- 14.2 Where you have any doubt in relation to the level of vetting which should be done on a supplier or contractor, please speak to Cubico Compliance.

15. Risk Categories of Business Partners

- 15.1 The scope of vetting for a particular Business Partner depends on the likely level of risk posed to Cubico by it. Business Partners are categorised into the three categories shown below.
- 15.2 The risk description for each risk category is not prescriptive and so employees should exercise their reasonable judgment when determining the appropriate risk category for a particular Business Partner. By way of example, the engagement of a globally recognised law firm would typically be considered low risk notwithstanding that the value of the engagement may be in excess of USD 100,000 per annum. On the other hand, engagement of a small, unknown, local law firm in a high risk jurisdiction would be considered high risk notwithstanding that the value of the engagement may be less than USD 25,000. Where you are in any doubt about the scope of vetting which should be performed, please speak to Compliance.

Risk Category	Risk Description
Low Risk	<ul style="list-style-type: none"> ▪ These Business Partners have little or no insight into or influence over Cubico’s business and decision making. It is unlikely any legal or reputational liability could be created for Cubico as a result of their misconduct. ▪ Suppliers of less than USD 25,000 per annum would typically fall within this category.



Medium Risk	<ul style="list-style-type: none"> ▪ These Business Partners have some insight into or influence over Cubico’s business and decision making. Misconduct by them could create legal or reputational liability for Cubico. ▪ Suppliers of USD 25,000 - USD 100,000 per annum would typically fall within this category.
High Risk	<ul style="list-style-type: none"> ▪ These Business Partners have significant insight into and influence over our business and decision making. It is very likely that misconduct by them could create legal or reputational liability for Cubico. ▪ Suppliers of in excess of USD 100,000 per annum, JV partners, sellers, developers, acquisition targets, bid/tender consultants, lobbyists, agents and social projects providers would typically fall within this category.

16. Scope of Vetting

16.1 Business Partners should go through the appropriate vetting (see below):

16.1.1 when the relationship with Cubico is first formed;

16.1.2 at the intervals specified for each Risk Category (see below);

16.1.3 when the nature of the Business Partner’s relationship with Cubico changes such that it e.g. changes from a Medium Risk to a High Risk Business Partner; or

16.1.4 otherwise as required by Compliance.

16.2 No agreements should be signed with and no payments made to Business Partners who have not gone through an appropriate Vetting.

Business Partner Risk Category	Scope of Vetting	Timing of Vetting
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<p>Low Risk</p>	<ul style="list-style-type: none"> . justification of business need for Business Partner; . confirmation that the Business Partner has the relevant experience, capabilities and financial resources; . verification of identity and tax registration of Business Partner; 4. confirmation of banking details; . confirmation no link to Cubico employee, officer or director; and . incorporate anti-bribery terms into contract/agreement with Business Partner. 	<p>Prior to commencement of the relationship; every three years subsequently; upon direction of Compliance.</p>
<p>Medium Risk</p>	<p>As Low Risk, plus:</p> <p>review media archives and online resources to establish track record of operating as a reliable and ethical business partner and any allegations;</p> <p>2. confirmation of ownership;</p> <p>confirmation of necessary licenses or permits; and</p> <p>identify whether the Business Partner appears on UN, US, UK, World Bank “blacklists”.</p> <p><i>Items 1 – 4 above are fulfilled by Cubico Compliance running screening checks on the “Compliance Catalyst” tool.</i></p>	<p>Prior to commencement of relationship; every three years subsequently; upon direction of Compliance.</p>
<p>High Risk</p>	<p>As Medium Risk*, plus:</p> <p>investigative due diligence through specialist provider to establish reputation, bribery concerns, use of political influence for commercial reasons, litigation searches etc.;</p> <p>distribute Cubico’s Supplier Code of Conduct (<i>Please request a copy of this document from Compliance or locate it in the Policies section of the Intranet</i>); and</p> <p>where the Business Partner is a majority JV partner, review of Business Partner’s anti- bribery systems and the formation of joint anti-bribery policies and risk management.</p> <p><i>Please contact Compliance to arrange this.</i></p>	<p>Prior to commencement of relationship; every two years subsequently (except in the case of acquisitions of projects from sellers / developers or where the target has been fully incorporated into the Cubico Group); upon direction of Compliance.</p>

If you have any concerns about a Business Partner, or that this policy is not being followed, speak to your Manager or Cubico Compliance. Alternatively, use Safecall, Cubico’s confidential whistleblowing hotline.





Appendix C – Cubico Speak Up Procedure



APPENDIX C

Cubico Speak Up Procedure

1. Objective

Cubico is committed to reducing fraud and unethical practices in the workplace and identifying and remedying wrongdoing. You can help Cubico in the fight against unethical behaviour by reporting suspicions of malpractice.

2. Scope

This document applies to all Cubico employees.

3. Application

Any employee who becomes aware of the committing of an allegedly unlawful act or a breach of Cubico's Code of Conduct or other policy should speak up as soon as possible. Cubico's Code of Conduct makes it clear that taking negative action against an employee for having sent a Speak Up report is **strictly prohibited**.

4. Procedure

Employees can report any concerns to their manager. Alternatively, where you prefer not to report to your manager, you can report them to Cubico Compliance by:

- 
- Sending an email to speakup@cubicoinvest.com

Where you do not wish to raise concerns directly to Cubico, please use the independent service provided by Safecall.

5. Safecall

Cubico maintains an independent Speak Up hotline, operated by Safecall. Safecall is an external reporting line where you may raise concerns anonymously and be assured that they will be fully addressed. All calls are treated with the utmost confidentiality by independent staff who will not disclose your name (unless you give permission to do so).

Safecall will take calls on a range of compliance issues, including but not limited to:

- Fraud
- Bribery & Corruption



- Unethical Conduct
- Bullying, harassment or other HR concerns
- Anti-competitive behaviour
- Environmental/ Health & Safety
- Other serious concerns

Report Your Concerns in Confidence



6. How to Report to Safecall

You can contact Safecall at any time on the appropriate international freephone number and ask to speak to someone in your preferred language.

Country	Number
UK	0800 915 1571
Spain	00800 7233 2255
Italy	00800 7233 2255
Greece	00 800 441 41966
Australia	1800 312928
Mexico	01800 123 1758
USA	1866 901 3295
Uruguay	0004 044 037
Colombia	01800 9448040

Alternatively you can make a report online at: www.safecall.co.uk/report

7. How SafeCall Works



