



Rohannah Solar Energy Management Ltd

Policies & Compliance Handbook (Part 1)

Registered Office: Office 8559, 321–323 High Road, Chadwell Heath, Essex, Romford, England, RM6 6AX

ICO Registration Number: C1786087

Health & Safety Officer: Mr. Jerimiah Bonner

Governing Law: England & Wales

Contact: info@rohannahsolarenergy.co.uk

1. Introduction & Corporate Governance

Rohannah Solar Energy Management Ltd (“the Company”) is a renewable energy project management firm specialising in **commercial and institutional solar-energy infrastructure**. The Company provides full-service project oversight — including planning, procurement, logistics, compliance, and quality assurance — for clients across the United Kingdom.

We operate **exclusively within the business-to-business (B2B) sector**, forming contractual relationships only with registered companies, developers, local authorities, and public-sector entities.

The Company is committed to maintaining high standards of integrity, safety, and environmental responsibility in all its operations.

This Policy & Compliance Handbook establishes our framework for legal, ethical, and professional conduct and demonstrates our alignment with the **Renewable Energy Consumer Code (RECC)** standards applicable to business practices.

Our corporate governance objectives are:

- To maintain transparent, compliant business operations.
- To ensure all staff, contractors, and partners act ethically and professionally.
- To deliver projects that meet or exceed all legal and technical standards.

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- To build long-term partnerships based on trust, compliance, and sustainability.

Every employee, subcontractor, and partner is required to adhere to the principles outlined in this handbook. Breaches may result in disciplinary or contractual action.

2. Scope of Operations

Rohannah Solar Energy Management Ltd operates as a **renewable-energy project management company** offering services that include:

- Solar project management and coordination.
- Supply chain and logistics oversight.
- Compliance management for RECC and MCS standards.
- Procurement of certified solar components and materials.
- Supervision of subcontracted installation teams.
- Site inspections, quality assurance, and final certification support.
- Maintenance scheduling and performance monitoring.

We **do not** contract directly with domestic consumers or householders.

All engagements are structured through **business-to-business agreements** or frameworks governed by **commercial law**, not consumer law.

The Company's activities extend to:

- Corporate and industrial sites.
- Local authority infrastructure.
- Property developers and construction projects.
- Commercial landlords, housing associations, and estate managers.

This scope aligns with the **RECC Code of Conduct** to the extent it applies to commercial energy services, ensuring our clients and partners receive the same level of professionalism, transparency, and accountability expected of MCS-compliant organisations.

3. Legal & Regulatory Framework

All company operations are governed by the following UK legislation and standards:

- **Companies Act 2006**
- **Health & Safety at Work etc. Act 1974**
- **Management of Health & Safety at Work Regulations 1999**
- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**
- **Bribery Act 2010**
- **Modern Slavery Act 2015**
- **Equality Act 2010**
- **Environmental Protection Act 1990**
- **Waste Electrical and Electronic Equipment (WEEE) Regulations 2013**
- **RECC Code of Conduct, MCS, and TrustMark Frameworks**

The Company also complies with the **Late Payment of Commercial Debts (Interest) Act 1998** and the **Contracts (Rights of Third Parties) Act 1999**, where applicable.

All staff and contractors are trained in relevant compliance obligations and must complete periodic refresher training.

4. Contracting, Pricing & Payment Policy

4.1 Contract Formation

All contractual relationships must be formalised in writing.

Contracts outline the full scope of work, deliverables, performance obligations, and payment terms.

Contracts are reviewed by a company director before execution to ensure compliance with company policy, UK law, and relevant RECC and MCS frameworks.

4.2 Pricing

All project quotations are issued in writing and based on the agreed scope.
Unless otherwise specified, all prices are **exclusive of VAT**.
Quotes remain valid for **30 days** unless otherwise stated.

4.3 Payment Terms

Invoices are issued upon agreed milestones, completion stages, or as per written contracts.
Standard payment terms are **30 days net** from the invoice date.
Late payments may incur statutory interest under the **Late Payment of Commercial Debts (Interest) Act 1998**.

4.4 Procurement & Deposits

For projects requiring material purchase or site mobilisation, the Company may request an upfront deposit.
All deposits are applied transparently to the final invoice and held in accordance with the agreed commercial contract.

4.5 Disputed Invoices

Disputed invoices must be raised in writing within **5 business days** of receipt.
No party may withhold payment without valid written notice and supporting documentation.

5. Refund & Cancellation Policy (B2B Context)

As a commercial operator, Rohannah Solar Energy Management Ltd does not fall under the **Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013**.
Cancellations, refunds, or variations are handled under **mutually agreed B2B contractual terms**.

If a client cancels a project before mobilisation, the Company reserves the right to recover:

- Costs incurred for design, planning, or procurement work completed;
- Restocking or supplier cancellation fees;
- Reasonable administrative and labour costs.

All refunds or adjustments are processed by written agreement between both parties. Any deposit refund, where applicable, will be returned within **30 business days** following written acceptance of cancellation and deduction of verified costs.

6. Data Protection, Privacy & ICO Compliance

Rohannah Solar Energy Management Ltd is fully compliant with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

The Company is registered with the **Information Commissioner's Office (ICO)** under reference number **C1786087**.

6.1 Data Protection Principles

We uphold the seven data protection principles as set out in Article 5 of the UK GDPR:

1. Lawfulness, fairness, and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality
7. Accountability

6.2 Data We Collect

We collect and process the following data categories:

- Business contact details of clients and suppliers
- Contract documentation
- Financial and billing records

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- Project-related information (e.g., site, equipment, contractor details)
- Employee and subcontractor records (for HR and compliance purposes)

6.3 Lawful Basis for Processing

Data is processed under Article 6(1)(b) and (f) of the UK GDPR:

- For the performance of a contract, and
- For the legitimate interests of the Company in managing commercial relationships.

6.4 Data Security

We employ robust technical and organisational controls, including:

- Secure, encrypted cloud storage
- Multi-factor authentication and password protection
- Restricted data access on a need-to-know basis
- Regular cybersecurity audits

6.5 Data Sharing

Data is shared only with:

- Accredited subcontractors working on behalf of the Company;
- Legal, regulatory, or auditing authorities (where required by law);
- Insurers and professional advisors (under confidentiality agreements).

6.6 Data Retention

Retention periods:

- Contract and project data – 7 years post-completion
- Financial and tax data – 7 years
- Employee and subcontractor data – 6 years after departure

6.7 Subject Access Requests

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All data subjects may request access, rectification, or deletion of their data by contacting:

✉ info@rohannahsolarenergy.co.uk

Requests are acknowledged within **5 business days** and processed within **30 days**.

6.8 Breach Management

Any data breach will be logged, investigated, and, if applicable, reported to the ICO within **72 hours** of discovery, in line with Article 33 of the UK GDPR.

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B2B Policies & Compliance Handbook (Part 2)

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Health & Safety Officer: Mr. Jerimiah Bonner

Governing Law: England & Wales

7. Confidentiality & Cybersecurity Policy

The Company recognises that confidential information, intellectual property, and digital assets are among its most valuable resources.

To protect these, we maintain strict cybersecurity and confidentiality standards.

7.1 Confidential Information

All employees, directors, contractors, and subcontractors must treat all non-public information as confidential, including:

- Client data and project specifications
- Financial and commercial data

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- Employee and subcontractor records
- Trade secrets, technical information, and IP assets

Disclosure is prohibited unless authorised in writing by a Director or required by law. Non-disclosure agreements (NDAs) are mandatory for subcontractors and consultants.

7.2 Cybersecurity Measures

The Company maintains:

- Secure, encrypted email and document storage
- Two-factor authentication for all systems
- Firewalls and anti-malware protections
- Restricted administrative access rights
- Regular penetration and vulnerability testing

All staff receive cybersecurity awareness training annually.

8. Health & Safety Policy

Rohannah Solar Energy Management Ltd places the **health, safety, and welfare** of its employees, contractors, and the public at the heart of all operations.

8.1 Policy Responsibility

The appointed **Health & Safety Officer, Mr. Jerimiah Bonner**, is responsible for implementing, reviewing, and maintaining this policy in accordance with the **Health & Safety at Work etc. Act 1974**.

8.2 Company Commitments

- Provide and maintain a safe working environment.
- Conduct risk assessments for all work activities.
- Ensure all employees and contractors receive safety training.
- Supply appropriate Personal Protective Equipment (PPE).

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- Maintain safe systems for storage and handling of materials.

8.3 Contractor Obligations

Subcontractors must:

- Submit Risk Assessments and Method Statements (RAMS) prior to mobilisation.
- Comply with site-specific safety rules and signage.
- Report any incidents or near-misses immediately.

8.4 Reporting

All incidents are logged and investigated to prevent recurrence.
Annual safety audits are conducted and documented.

9. Environmental & Sustainability Policy

Rohannah Solar Energy Management Ltd recognises environmental protection as an essential part of its business strategy.

We are committed to continual improvement in sustainability and reducing environmental impact across all operations.

9.1 Key Objectives

- Reduce carbon emissions and waste.
- Promote efficient use of energy and natural resources.
- Source materials responsibly from sustainable suppliers.
- Minimise non-renewable resource use across logistics.

9.2 Net Zero Commitment

The Company is committed to achieving **operational Net Zero by 2030**.
This includes:

- Transitioning to renewable electricity for offices.

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- Encouraging low-emission vehicles and travel.
- Carbon-offsetting residual emissions through verified schemes.
- Partnering with clients to deliver low-carbon energy solutions.

9.3 Compliance

We comply with all relevant environmental laws including:

- **Environmental Protection Act 1990**
- **Waste (England and Wales) Regulations 2011**
- **Hazardous Waste Regulations 2005**
- **WEEE Regulations 2013**

An annual review assesses progress toward our Net Zero goals.

10. Subcontractor & Supply Chain Management Policy

We work exclusively with accredited, competent, and compliant partners.

10.1 Supplier Standards

All subcontractors and suppliers must:

- Hold valid **MCS certification** for solar installations.
- Be registered under **RECC** or **TrustMark** (where relevant).
- Maintain up-to-date insurance certificates.
- Comply with Health & Safety, Modern Slavery, and Equality legislation.

10.2 Vetting & Onboarding

Each new supplier is subject to due diligence checks including:

- Proof of certification and competence.
- Financial stability verification.
- References from prior clients.

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- Confirmation of data-protection compliance.

10.3 Monitoring & Review

Performance reviews are conducted quarterly.

Non-compliance may result in suspension or termination of supplier relationships.

11. Equality, Diversity & Inclusion Policy

Rohannah Solar Energy Management Ltd is committed to creating a workplace free from discrimination and promoting equality of opportunity for all.

We comply fully with the **Equality Act 2010**, ensuring no discrimination on the grounds of:

- Race or ethnicity
- Gender or gender identity
- Religion or belief
- Age
- Disability
- Sexual orientation

11.1 Company Commitments

- Provide equal access to training, development, and advancement.
- Promote a culture of respect and inclusion.
- Take disciplinary action against discrimination or harassment.

The Company also extends these principles to all subcontractors and suppliers.

12. Anti-Bribery & Corruption Policy

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We have a **zero-tolerance** policy toward bribery, corruption, and unethical business conduct.

12.1 Legal Basis

This policy is compliant with the **Bribery Act 2010**.

12.2 Company Standards

No employee or partner shall:

- Offer, promise, or give a bribe.
- Request or accept a bribe or facilitation payment.
- Engage in fraud or improper influence.

Any breaches must be reported immediately to the Director or Compliance Officer. Violations will result in termination and may lead to prosecution.

13. Modern Slavery & Human Rights Policy

The Company opposes all forms of slavery, servitude, and forced labour.

13.1 Legal Basis

This policy complies with the **Modern Slavery Act 2015**.

13.2 Company Actions

- Conduct annual supplier assessments to ensure ethical operations.
- Require written confirmation of compliance from subcontractors.
- Maintain transparent and fair labour practices.

No person under 18 is employed in hazardous work or without appropriate protections.

14. Whistleblowing Policy

We encourage employees, contractors, and partners to report any wrongdoing, breach of policy, or unsafe practice.

Reports may be made in confidence to a Director or to **Mr. Jerimiah Bonner (Health & Safety Officer)**.

No whistleblower will face retaliation or discrimination.
Anonymous reports will still be investigated with discretion.

15. Quality Assurance & Continuous Improvement Policy

Rohannah Solar Energy Management Ltd is committed to delivering consistent quality in every project.

15.1 Objectives

- Maintain compliance with all statutory and industry requirements.
- Monitor project outcomes for quality assurance.
- Capture client feedback to drive improvement.

Internal audits and reviews are conducted annually.
Corrective actions are documented, implemented, and reviewed for effectiveness.

16. Training & Competency Policy

The Company ensures all staff, subcontractors, and consultants maintain the competence required for their roles.

16.1 Mandatory Training

- RECC and MCS compliance awareness
- Health & Safety induction
- Cybersecurity and data protection
- Environmental and sustainability training

16.2 Records

Training records are retained for a minimum of **5 years**.
Annual refresher courses are mandatory for operational staff and project leads.

17. Insurance & Risk Management Policy

To safeguard our clients and partners, the Company maintains appropriate insurance coverage.

17.1 Insurance Coverage

- **Public Liability Insurance:** £5,000,000
- **Professional Indemnity Insurance:** £1,000,000
- **Employers' Liability Insurance:** £10,000,000
- **Contractors All-Risk (CAR) Insurance:** project-dependent

Copies of insurance certificates are available upon request.

17.2 Risk Management

We maintain a company-wide risk register.
Key risks (financial, operational, reputational) are assessed quarterly and mitigated through documented controls.

18. Corporate Social Responsibility (CSR) & ESG Policy

Our CSR and ESG strategy integrates ethics, sustainability, and accountability across all areas of operation.

18.1 Environmental Responsibility

- Prioritise renewable energy and low-carbon transport.
- Implement waste-reduction and recycling initiatives.

18.2 Social Responsibility

- Support community renewable-energy awareness.
- Encourage workforce diversity and inclusion.
- Promote fair labour and local employment.

18.3 Governance

- Maintain transparent reporting.
- Uphold ethical conduct and compliance.
- Conduct annual ESG performance reviews.

19. Record Keeping & Document Control

All operational, financial, and compliance records are managed in accordance with company procedures and statutory obligations.

Retention periods include:

- Financial & tax records – 7 years
- Contracts & warranties – 7 years post-completion
- Employee & training records – 6 years after employment ends
- Health & Safety documentation – 5 years minimum

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Documents are reviewed annually and securely destroyed at the end of their retention period.

20. Complaints Handling & Dispute Resolution Policy

The Company is committed to resolving complaints quickly and professionally.

20.1 Internal Process

- Complaints must be submitted in writing to **info@rohannahsolarenergy.co.uk**.
- Acknowledgement within **5 business days**.
- Investigation and written response within **20 business days**.

20.2 Escalation

If a complaint cannot be resolved internally, it may be referred to:

- **The Renewable Energy Consumer Code (RECC)** for mediation or arbitration;
or
- An **independent commercial mediator** agreed by both parties.

All disputes are governed by the **laws of England and Wales**.

21. Governing Law & Jurisdiction

This Policy Handbook and all company operations are governed by and construed in accordance with the **laws of England and Wales**.

Any dispute will fall under the exclusive jurisdiction of the **courts of England and Wales**.

22. Policy Review & Continuous Improvement

This handbook is reviewed annually by the Directors and the Health & Safety Officer to ensure it remains compliant with legislation and RECC guidance.

Any updates are communicated to all staff, subcontractors, and stakeholders.

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