



# UK Modern Slavery Statement 2025



## MESSAGE FROM THE CEO

Since the adoption of the "Mission-driven company" status in 2021,<sup>1</sup> Voltalia's Mission, as stated in its Articles of Incorporation, is to improve the global environment by fostering local development. Voltalia's sustainable development strategy is built around three fundamental pillars, that enable us to pursue our Mission:

- Our teams, the source of our success
- Safety first
- Integrity and Ethics.

Voltalia is fully committed to protecting the fundamental rights of Voltalia's employees and every person who interacts with the company or its activities (subcontractors, service providers, local communities, etc), and formally prohibits the use of any form of slavery, human trafficking, inhuman and degrading treatment and forced labour occurring in its own operations, the operations of their subsidiaries, and of its business partners. Additionally, Voltalia focus on protecting the health and safety of its stakeholders and offering its employees a work environment conducive to diversity, well-being and dialogue between management and employees.

The sustainable development pillars are monitored at the highest level of the organization and the Executive Committee supervises all extra-financial actions and engagements.

As a responsible company, Voltalia is committed to respecting the internationally recognized human rights set out in the International Bill of Human Rights and the fundamental conventions of the International Labour Organization. We are strongly committed to respecting the dignity of the human person and expect our employees, suppliers and relevant partners to respect human rights, based on the standards set forth on the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

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<sup>1</sup> The PACTE law (Action Plan for Business Growth and Transformation), promulgated on 22 May 2019, allows French law businesses which want to do so to acquire a "purpose" and to include social and environmental objectives in their bylaws in order to become a Mission-Driven Company.

## What is Modern Slavery?

Modern Slavery is a violation of human rights<sup>2</sup> and occurs in situations in which people are coerced to work either through the use of violence or intimidation, or by more indirect means such as manipulated debt, retention of identity papers or threats of denunciation to the immigration authorities. For the purposes of this Statement, it includes all forms of forced labour, child labour and human trafficking.

## Voltalia's Organization

Voltalia's core business is the production and sale of renewable energy generated from wind, solar, hydropower, biomass, and storage facilities that it owns and operates. The Group employs more than 1,600 people and operates in over 20 countries across four continents, serving clients worldwide.

To carry out its activities, Voltalia works with a wide range of third parties globally, including contractors, suppliers, subcontractors, and service providers. With the growing number of sites and operations, the Group recognises an increased risk of non-compliance with labour and human rights standards in its supply chain, particularly concerning certain key equipment. Of special focus is the extraction and processing of raw materials used in solar modules, which have a heightened exposure to Modern Slavery risks, as indicated by industry reports, NGO publications, and internal analyses by the Compliance Department.

Voltalia's approach to its relevant value chain is grounded in comprehensive policies covering human rights, Modern Slavery, responsible sourcing, and health and safety, reflecting our commitment to the highest standards in these areas. In 2024, no cases were reported involving conduct contrary to the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises within our upstream or downstream value chain.

## Governance, Policies and Standards addressing Modern Slavery

Voltalia's Health, Safety, Environmental & Social (HSES), Procurement, Compliance and Sustainability departments work together to assess current and potential negative impact caused by Voltalia's projects and activities, based on country, project and community social risks related to labour conditions and Human Rights in the workforce, and help put forward mitigation measures, namely throughout projects' lifecycle.

To that end, Voltalia has implemented measures, policies, and standards designed to prevent and address the risks of Modern Slavery within our business and relevant supply chain.

## Ethics Guide & Code of Conduct

All employees are expected to act responsibly and in accordance with Voltalia's values - integrity, ingenuity, entrepreneurship, and team spirit.

Based on absolute respect for the dignity of the human person, we demand from our employees and stakeholders strict respect for human rights. To ensure that everyone adheres to these commitments, employees and stakeholders must act in compliance with the Ethics Guide & Code of Conduct.

Voltalia is particularly committed to respecting the fundamental rights of its employees and those of its direct supply chain and thus forbids as part of its activities the use of any form of Modern Slavery, inhuman and degrading treatment.

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<sup>2</sup> Cf. article 4 of the Universal Declaration of Human Rights and article 5 of the EU Charter of Fundamental Rights.

Particularly, Voltalia prohibits any form of child labor involving their economic exploitation and sets 16 years the minimum age access to employment at Voltalia for non-hazardous tasks and 18 years for hazardous tasks.

Further, Voltalia recognizes freedom of association, the right to collective bargaining and the freedom of association of its employees and those of its direct supply chain and is committed to promoting social dialogue.

In this regard, the Code, by stating clearly what is expected from our associates, contributes to raising awareness regarding the potential negative impacts that our activities can have, which includes the risk of contracting with a third party involved in any form of Modern Slavery.

### **Human Rights Policy**

In 2024, Voltalia published its Human Rights Policy, committing the Group, suppliers, and subcontractors to uphold the rights set out in the Universal Declaration of Human Rights and the ILO's Fundamental Principles. Modern Slavery, discrimination, and harassment are strictly prohibited, and we are committed to maintaining a fair, safe, and positive work environment.

### **Health, Safety, Environmental & Social (HSES) Policy**

Voltalia continually seeks to improve and systematically implement HSES standards across all sites.

### **Due Diligence Procedure and Risk Assessment**

To ensure our principles and values are fulfilled, Voltalia has set up a risk-approach, multidisciplinary and multilevel due diligence processes, covering human rights impacts and risks:

#### **a. Integrity KYTP (*Know Your Third Party*) Procedure**

We are aware that operating in various regions of the world increases the risk of being unintentionally exposed to various forms of Modern Slavery. Voltalia's Integrity KYTP Procedure aims at preventing, identifying and mitigating risks and impact, including potential adverse impact on Human Rights.

This third-party management framework guides Voltalia's operations in all the countries where it operates. Employees are required to conduct risk-based assessments by collaborating with Procurement, Compliance, Sustainability, and HSES departments before engaging with any third party. These assessments help identify risks of Modern Slavery and enforce the inclusion of robust ethics and compliance clauses in contracts, with audit and termination rights.

#### **b. Audits and Risk Assessment**

Voltalia undertakes impact and risk assessments as required, to comply with regulatory obligations and to identify and mitigate potential negative impacts on the environment, local communities, and workers.

In particular, Voltalia's Environmental & Social risk assessments aim to identify potential issues associated with a project that could lead to negative impacts to the natural environment, local communities and the project workforce. Such risk assessments consider a wide range of environmental and social risks such as Modern Slavery.

### **Ethics & Compliance Contractual clauses**

Voltalia includes Ethics & Compliance clauses with robust human rights requirements and obligations, in its agreements with relevant suppliers and contractors, to help mitigate Modern Slavery risk and hold suppliers and contractors accountable.

These clauses explicitly state that no form of Modern Slavery is taking place or has taken place within their own business and in any part of its supply chain, related to the execution of the

contractual relationship with Voltalia. Further it includes traceability, transparency and communication obligations, while entitling Voltalia to audit compliance with such obligations.

### **Whistleblowing System**

Voltalia has implemented a Whistleblowing system, allowing employees and external stakeholders to confidentially, and anonymously if preferred, report any illegal or unethical conduct, including human rights violations. The system complies with relevant legal requirements and best practices, ensuring protection from retaliation. Reports can be submitted via an accessible online platform across all company websites and other dedicated channels.

### **Grievance mechanisms**

Voltalia has introduced grievance mechanisms for internal and external stakeholders to report concerns or complaints, in line with IFC performance standards. All submissions, including those related to Modern Slavery, are recorded, investigated, and addressed through a structured process. An enhanced grievance tool is being implemented for all projects under construction in non-designated countries, as defined by the Equator Principles Association.

### **Awareness sessions**

Through onboarding, e-learning, and targeted awareness sessions, Voltalia is committed to educating employees and high-risk contractors on the risks of human rights violations, corruption, and Modern Slavery. In 2024 and 2025, we conducted training on the Integrity KYTP Procedure, facilitation payments, and whistleblowing system across most regions and Group companies.

### **Effectiveness and KPIs**

We are committed to continuously strengthening our controls to prevent and reduce adverse human rights impacts, including eliminating Modern Slavery in our business and supply chain.

#### **Our mains goals for 2025 are:**

1. Continuing to raise awareness through communications and training for all employees.
2. Continue to assess and monitor high-risk suppliers and subcontractors.
3. Update Voltalia's Ethics Guide and Code of Conduct, Integrity KYTP Procedure, and KYTP Policy.
4. Update Ethics & Compliance Risk Mapping.
5. Encourage employees and external stakeholders to remain vigilant and use the whistleblowing and grievance procedures to raise concerns.

We monitor and report on the effectiveness of our procedures using Ethics & Compliance KPIs, as part of a continuous improvement process. Regular reviews are conducted to ensure our procedures remain relevant, aligned with best practices and community expectations, and compliant with an evolving regulatory landscape, including the 2015 UK Modern Slavery Act, the European Corporate Sustainability Reporting Directive, and the forthcoming EU Corporate Sustainability Due Diligence Directive, EU Batteries Regulation and EU Forced Labour Ban.

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and has been approved by the Board of Directors of Voltalia UK and signed by its CEO.

August 2025

  
Simon Holt