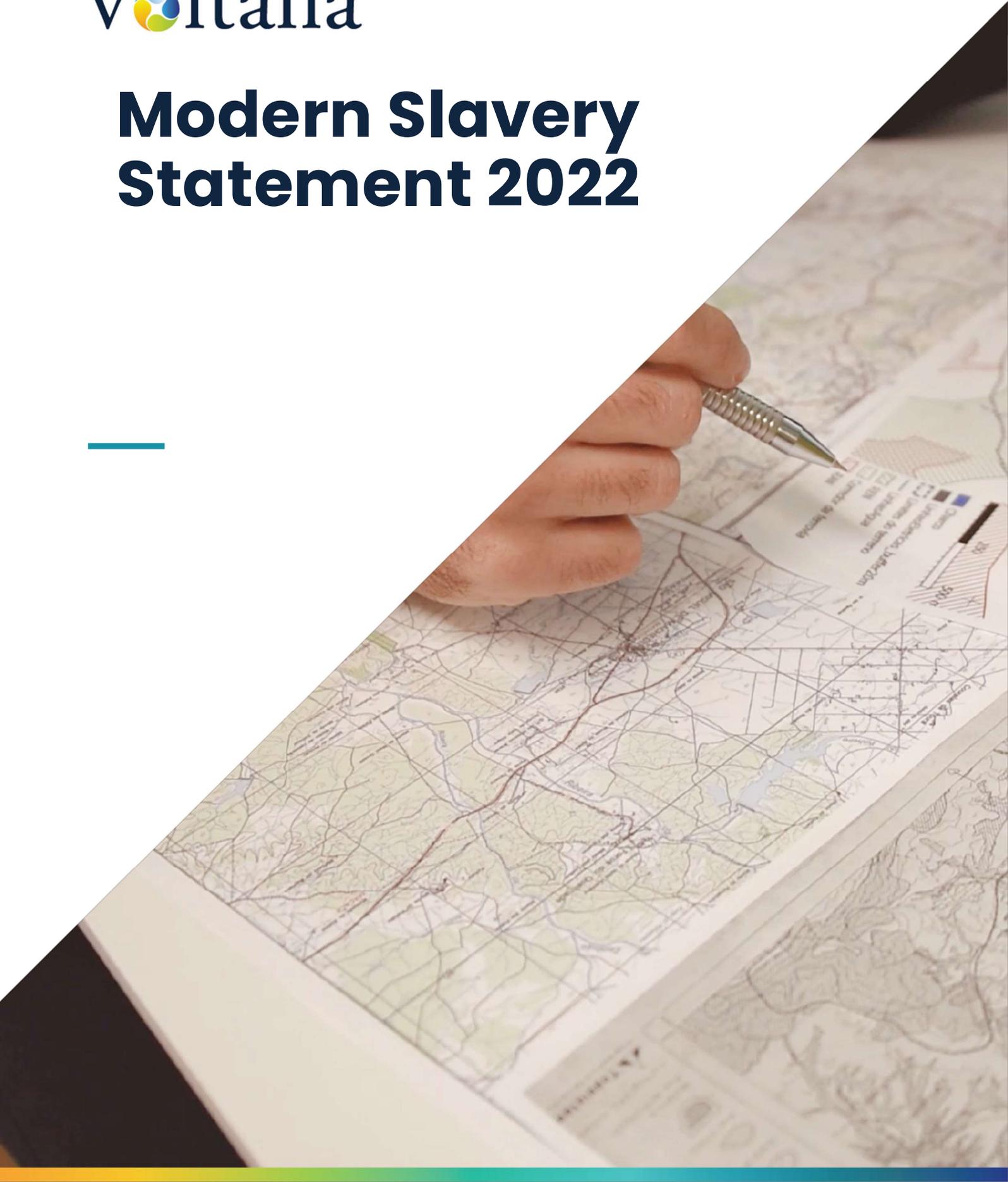




# Modern Slavery Statement 2022



## MESSAGE FROM THE CEO

*Voltalia's corporate purpose, as stated in its Articles of Incorporation, is to improve the global environment by fostering local development. Voltalia's has structured its sustainable development strategy which is built around four pillars:*

- *People first;*
- *Environmental protection;*
- *Uncompromising ethics;*
- *Trust-based long-term relationships.*

*The first pillar of this strategy concentrates on protecting Voltalia's employees and every person who interacts with the company or its activities (subcontractors, service providers, local communities...etc). Voltalia is naturally fully committed to preventing modern slavery and human trafficking from occurring within its business but also makes every effort to protect the health and safety of its stakeholders and to offer its employees a work environment conducive to diversity, well-being and dialogue between management and employees.*

*All sustainable development pillars are monitored at the highest level of the organization and the Executive Committee supervises all extra-financial actions and engagements. Voltalia's ethical commitment is also assessed every year by independent rating agencies. For example, Gaïa campaign results, announced on the 14th of October 2019, confirmed Voltalia's status as a responsible company. For its second year of participation, the company ranks among the top 70 French listed companies with the best extra financial ratings of a panel of 230 firms, underlining Voltalia's commitments on topics such as health and safety, business ethics or the fight against climate change. In line with these commitments, this statement is being made by Voltalia on behalf of the Group for the financial year of 2021.*

*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 require our employees, suppliers and partners to strictly respect human rights. To ensure that everyone adheres to these commitments, all stakeholders must be aware of and comply with Voltalia's Code of Ethics and Code of Conduct without delay. Voltalia is particularly committed to respecting the fundamental rights of its employees and those of its subcontractors and suppliers and formally prohibits the use of any form of slavery, inhuman and degrading treatment and forced labour in its activities<sup>1</sup>.*

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<sup>1</sup> *This statement is made by and on behalf of Voltalia UK LTD. and its relevant subsidiaries in compliance with the UK Modern Slavery Act 2015.*



## Voltalia's Organization Structure & Supply Chains

Voltalia's main business activity is the production and sale of renewable energy generated by the wind, solar, hydropower, biomass and storage plants that it owns and operates.

The electricity is either sold to public operators at prices set by regulation or defined in calls for tenders or to public or private customers on the open market. Voltalia is also a service provider and supports its clients in renewable energy projects during all phases, from design to operation and maintenance.

The Group has over 1000 employees and is present in 20 countries on 4 continents and is able to act worldwide on behalf of its clients.

To pursue its activities, Voltalia therefore resort to different types of third parties all around the world: contractors, suppliers, subcontractors, consultants, etc.

## Policies and Standards in Relation to Modern Slavery

The Group has taken measures and set up policies and standards to prevent and reduce the risk of slavery or human trafficking within our organization and our supply chain.

They include (but are not limited to) the following:

### **Voltalia's Ethics Guide & Code of Conduct**

Voltalia's mission is to improve the global environment and foster local development. Therefore, all collaborators are expected to contribute to achieving this mission by acting in a responsible way and in accordance with the ethical principles stated in the Ethics Guide. This Guide goes beyond the legal framework and formalizes our commitment to behave in accordance with our values (integrity, ingenuity, entrepreneurship, and team spirit). The Code is divided into two parts related to the fight against corruption and fraud and the protection of our employees and stakeholders. In this regard, the Code, by stating clearly what is expected of our collaborators, contributes to raising awareness regarding the potential negative impacts that can have our activities which includes the risk of contracting with a third party involved in forced labor and/or human trafficking. Since 2021, the new version of the Ethics Guide and Code of Conduct includes Voltalia's and its stakeholders' engagement on human rights and fundamental freedoms.

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

To ensure that our values are fully implemented, Voltalia has set up due diligence processes regarding every entity of the Group but also with every third party with which we contract. These procedures include (but are not limited to):

#### **KYTP procedure (Know your third party)**

This procedure aims at providing a clear and comprehensive operational framework for the conduct of Voltalia's business in all the countries in which it operates. Voltalia's employees are expected to abide by the highest standards of honesty, integrity and fairness and are therefore bound to perform due diligences, with the assistance of the Compliance and CRS department, before entering a contractual relationship with a third party. Indeed, Voltalia is aware that operating in various regions of the world increases our probability of being unintentionally exposed to forced labor or human trafficking. This procedure is therefore a safeguard as it allows us to run background checks that can notably highlight human rights violations. A new version, the KYTP Integrity procedure, was launch this year and enhances the human rights subjects' assessment.

## Audits and Risk Assessment

Vitalia is committed to performing risk assessments whenever required or advisable to comply with regulatory requirements and Vitalia's ethical standards. QHSE and ethics audits following an annual audit plan to check if the local organizations follow the rules and best practices defined by the Compliance, CSR and HSE action plans.

## Whistleblowing system

Vitalia has implemented a whistleblowing system, managed by an external provider, which is a mechanism that allows every employee to report any illegal or unethical behavior they have witnessed or been a part of. It is shaped in a way that complies with the applicable laws and guarantees confidentiality and protection for the person issuing an alert. Therefore, if any employee identifies signs of violations of Human Rights (including slavery and human trafficking) as part of their activities, they can pass the information by using one of the dedicated means anywhere we operate.

Since 2021, all third parties can blow the whistle via the dedicated platform EthicsPoint by Navex: <https://secure.ethicspoint.eu/domain/media/en/gui/106905/index.html>.

## Awareness sessions

Through our onboarding and ethics awareness sessions, Vitalia is committed to educate and its employees of the risks of human rights violations including modern slavery and human trafficking in our business and supply chains.

In 2022, the training sessions on Ethics and Compliance will be improved considering the latest developments and challenges in this area; An eLearning training program will be implemented.

## Effectiveness and KPIs

This year, we will continue strengthening our controls to prevent slavery and human trafficking from occurring in our business.

This year our main goals are:

1. Continue to raise awareness through communications to all VItalians through our Group (Ethics & Compliance, HSE and Procurement) training sessions programs;
2. Roll out Ethics & Compliance training which is compulsory for all staff (KPI 2022: 95% of the staff trained on Ethics & Compliance).
3. Launch an eLearning training program on Ethics & Compliance which will be available and mandatory to all VItalians (Q3);
4. Annual review of all our policies outlined in relation to combatting slavery and human trafficking, including the new INTEGRITY KYTP Procedure enhancing human rights assessment;
5. Conduct compliance reviews on hiring and outsourcing and vetting to ensure processes are being adhered to;
6. Update our Ethics Guide and Code of Conduct and all compliance procedures as and when required;
7. Update the group risk mappings on Ethics & Compliance (ESG) annually.

These KPIs are monitored as part of a continuous improvement process to assess the effectiveness of our procedures. Regular reviews will be carried out to ensure Voltalia's procedures relevance and alignment with best practice.

Voltalia will continue to enhance its ethics and extra-financial engagements within the Group and to spread a strong purpose which has two objectives:

- Improve global environment: by developing, building and maintaining renewable power plants on its own behalf and on behalf of its clients, Voltalia contributes to the fight against the phenomenon of global warming.
- Foster local development: by targeting in priority regions of the world where renewable energy does not require subsidies, Voltalia produces locally affordable electricity and creates local jobs in the most developed countries as well as in emerging countries.

For this reason, Voltalia is committed to complying with the laws and regulations that apply in every country in which it operates, including those related to forced labor and human trafficking such as the UK Modern Slavery Act 2015 which will be used as a catalyst for action across these wider issues.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and has been approved by the Board of Directors.

June 2022

A blue ink handwritten signature, appearing to be "Simon Holt", is written over the background image of a hand pointing at a map.

*Simon Holt, UK Country Manager*

