

MODERN SLAVERY STATEMENT

Voltalia UK

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 2019.**

This statement is made by and on behalf of Voltalia UK LTD. and its relevant subsidiaries¹ 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 800 employees and is present in 20 countries on 4 continents and is able to act worldwide on behalf of its clients

¹ MTS Penderi Solar 2 Limited, MTS Stud Farm Solar Limited, South Farm Solar Limited, Clifton Solar Limited, Hallen Energy Limited.

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.

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.

- **Audits and Risk Assessment**

Voltalia is committed to performing risk assessments whenever required or advisable to comply with regulatory requirements and Voltalia'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 HSE Master Plan.

- **Whistleblowing system**

Voltalia 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 (by phone, mail or on the app).

- **Awareness sessions**

Through our onboarding and ethics awareness sessions, Voltalia 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.

QHSE and ethics audits following an annual audit plan to check if the local organizations follow the rules and best practices defined by the HSE Master Plan.

Effectiveness and KPIs

In order to monitor the effectiveness of the policies and standards in place to prevent the occurrence of modern slavery and human trafficking within its supply chain, Voltalia has identified the following Key Performance Indicators:

- Number of staff trained on ethics and code of conduct
- % of projects where KYTP are carried out
- Number of audits carried out yearly
- Number of risk assessments carried out yearly
- Number of complaints related to modern slavery and human trafficking received from internal and external stakeholders

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.

Action Plan

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 and signed by the Board of Directors.


Simon Holt

Craig Windram

Rui Ribeiro