



UK Modern Slavery Statement 2024



MESSAGE FROM THE CEO

Since the adoption of the "Mission-driven company" status in 2021,¹ Voltaia's Mission, as stated in its Articles of Incorporation, is to improve the global environment by fostering local development. Voltaia'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.

Voltaia is fully committed to protecting Voltaia's employees and every person who interacts with the company or its activities (subcontractors, service providers, local communities, etc), and thus to preventing modern slavery and human trafficking from occurring in its own operations, the operations of their subsidiaries, and of its business partners. Additionally, Voltaia focus on protecting 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.

The sustainable development pillars are monitored at the highest level of the organization and the Executive Committee supervises all extra-financial actions and engagements. Voltaia's sustainability commitments are also assessed by independent rating agencies. For example, Voltaia has been included in the Gaïa index for the sixth consecutive year, received the Gaïa index Gold Medal in 2023 and was among the top ten renewable energy producers in the Sustainalytics global index, which evidences Voltaia's commitments on topics such as health and safety, business ethics or the fight against climate change.

As a responsible company, Voltaia 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 Voltaia's Code of Ethics and Code of Conduct without delay. Voltaia 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 activities².

¹ 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.

² This statement is made by and on behalf of Voltaia 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 1850 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 resorts to different types of third parties all around the world: contractors, suppliers, subcontractors, consultants, among others.

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

All employees are expected to contribute to achieving Voltalia's Mission by acting in a responsible way and in accordance with the ethical principles & values 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 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 forced labour 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 principles & values are fully implemented, Voltalia has set up due diligence processes. These procedures include (but are not limited to):

- **Integrity KYTP (Know your third-party) procedure**

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 Ethics & Compliance and Corporate Social Responsibility (CSR) departments, 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 labour or human trafficking. This procedure is therefore a safeguard as it allows us to run background checks that can notably detect human rights violations' risk.

A new version, the KYTP Integrity procedure, was launched in 2022 and enhances the human rights risks' assessment. Notably, we have increased the frequency of high-risk suppliers, namely Forced Labour and other Human Rights' violations high-risk suppliers' due diligence and monitoring.

- **Audits and Risk Assessment**

Volitalia is committed to performing risk assessments whenever required to comply with regulatory requirements and Volitalia's ethical standards.

Suppliers undertaking high risk supply and services activities must complete and comply with our prequalification procedure as part of the selection criteria.³

Real time feedback is regularly gathered from suppliers in contract and where needed suppliers are re-assessed to ensure we have latest information in line with regulatory requirements.

Additionally, according to Volitalia internal audit yearly plan, Quarterly Health & Safety & Environment (QHSE) and ethics audits, check if the local organizations follow the rules and best practices defined by the Compliance, CSR and HSE action plans.

Whistleblowing system

Volitalia has implemented a whistleblowing system, managed on an external provider platform. It provides every employee and external stakeholder the opportunity to report any illegal or unethical behavior they have witnessed or have been a part of. It is managed in a way that complies with the applicable laws and guarantees confidentiality and protection for the person issuing an alert. Therefore, if any employee or external person or entity identifies signs of violations of human rights (including slavery and human trafficking) as part of their activities, they can report the information by using the platform and any of the dedicated means anywhere we operate.

<https://secure.ethicspoint.eu/domain/media/en/gui/106905/index.html>.

Grievance mechanisms

Volitalia is putting in place systems that allow internal and external stakeholders to report their grievances, opinions or claims regarding the Group's projects.

A grievance management process follows several steps, from receiving the grievance, recording it, investigating the circumstances, and proposing a resolution to the complainant if necessary. All types of complaint are analyzed, including those relating directly or indirectly to cases of modern slavery.

Volitalia has a centralized complaints management tool aligned with IFC performance standards deployed in Albania, Brazil, Kenya, and the UK. The tool makes it possible to monitor grievance response times and to document and consolidate the types of grievances received and the solutions proposed. The aim is to strengthen the sharing of best practices and to improve social risk management and dialogue with local communities in a sustainable way.

A new, enhanced tool will be rolled out to all projects under construction in non-designated countries as defined by the Equator Principles Association in 2024, then to other countries and projects in 2025.

³ The prequalification questionnaire complies with the Common assessment standard late 2023 which now supersedes PAS91.

Awareness sessions

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

As well as e-learning training on anticorruption, Volitalia conducts specific training on its Mission, on 'Safe and Positive Workplace Environment' and Exposed Personnel.

In 2024, specific training on Integrity KYTP Procedure, Facilitation Payments and Ethics & Compliance onboarding were generalized in all regions and affiliates. These trainings modules include education on human rights' risks and obligations.

Effectiveness and KPIs

This year, we will continue strengthening our controls to prevent modern slavery/ forced labour and human trafficking from occurring in our business and in our chain of activities.

Thereby, our mains goals are:

1. Continue to raise awareness through communications to all Voltalians through our Group (Ethics & Compliance, HSE and Procurement) and through training sessions programs;
2. Besides Volitalia's E-learning training program on Ethics & Compliance mandatory to all Voltalians, widen Ethics & Compliance trainings to all Volitalia Group (including subsidiaries) employees, regardless of geography;
3. Consolidation of the Ethics and Compliance process for high-risk suppliers (Integrity KYTP, Ethics Guide and Code of Conduct, and contractual clauses that include termination situations)
4. Update our Ethics Guide and Code of Conduct and all compliance procedures as and when required;
5. Regularly update relevant risk maps;
6. Encourage employees to keep vigilant and use the whistleblowing procedure to raise concerns.

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 Volitalia's procedures relevance and alignment with best practices and community's expectations, in particular with the application of the European CSRD (Corporate Sustainability Reporting Directive) 2024.

Therefore, Volitalia is committed to complying with the laws and regulations that apply in every country in which it operates, including those related to forced labour and human trafficking such as the UK Modern Slavery Act 2015 and will therefore 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 2024



Simon Holt