



Modern Slavery Statement 2023

This statement is published by Sonnedix Power Holdings Limited, on behalf of its subsidiary Sonnedix UK Services Limited, pursuant to section 54 of the UK Modern Slavery Act 2015 (“Act”). It sets out the steps taken by Sonnedix Power Holdings Limited and its subsidiaries (collectively “Sonnedix”) during the financial year 2023 to prevent and eradicate forced labour and human trafficking in Sonnedix’s global operations and supply chains. It is signed by our Executive Chairman and was adopted by the Board of Directors in line with the Act.

Our Business

Sonnedix is an established Renewable Energy Producer with a proven track record of successfully designing, financing, building and monitoring high-performance, cost-competitive renewable energy projects around the world.

At the close of 2023, the Sonnedix corporate structure included multiple entities in and 550 employees across Chile, the United States of America, France, Spain, Italy, Germany, Poland, Portugal the United Kingdom, and including employees of our trusted Japanese development partner, Sonnedix Japan K.K. Sonnedix had a total capacity of 10,480 MW of which 3,052MW were operational/mechanically complete, 1,215MW were under construction, and a further 6,213MW were under development.

The majority of Sonnedix employees are office or project based, Sonnedix does not provide any manufacturing services or supply raw materials to manufacturers, we build and operate our plants with equipment, parts and services provided by third parties and. As a result, the key risk area for modern slavery is within the procurement and supply chain activities undertaken through a limited number of global partners, suppliers and service providers.

Our Policies

Integrating responsible, forward-thinking corporate policies into our daily business practices is key to us achieving our purpose to power a bright future. It’s what allows Sonnedix to behave sustainably, ethically and accountably as we develop, finance, build and operate renewable energy projects around the world. It’s also what ensures that Sonnedix has a positive impact on our people, the environments, and communities within which we work.

Sonnedix has zero-tolerance for the use of child or forced labour on our projects or plants and we will not knowingly do business with contractors, subcontractors, business partners or vendors who violate these practices or the human rights of those working on their behalf.

Our commitment and zero-tolerance approach is detailed in the Sonnedix Social Policy and Standards document, namely in the Human Rights, Child and Forced Labour Standard (refer to https://www.sonnedix.com/wp-content/uploads/2020/04/2020_SX_ESG-Social-Policy-and-Standards.pdf). We expect the same zero-tolerance approach from those who undertake work on our behalf and these expectations are set out in the Sonnedix Responsible Supply Chain Design and Procurement Standard.

In addition to the Sonnedix Social Policies and Standards detailed above our commitment is underpinned in the following governance policies and standards (refer to https://www.sonnedix.com/wp-content/uploads/2020/04/2020_SX_ESG-Governance-Policy-and-Standards.pdf).

- Sonnedix Governance Policy,
- Sonnedix Whistleblowing Policy,
- Sonnedix Third Party Grievance and Communications Standard,
- Sonnedix Contractor HSEC Management Standard,
- Sonnedix Global Partners Standards of Conduct, and
- Sonnedix Code of Ethics and Business Conduct.

Sonnedix is committed to the highest ethical standards in our work and in our interactions with customers, suppliers, utilities, co-investors, competitors and our community. An important aspect of accountability and transparency is a mechanism to enable all individuals to voice concerns internally in a responsible and effective manner when they discover information that they believe shows wrongdoing. Sonnedix therefore provide 24/7 reporting of any concern including those which may relate to slavery and human trafficking.

Due Diligence

Recognising the supply chain as a key risk area, Sonnedix conducts comprehensive due diligence on its high-risk third-party engagements, including on its construction contractors and plant operators. This due diligence process includes a review of, among other things:

- Global commercially provided databases,
- Government lists, and
- Media reports.

In addition, our contractual documentation includes appropriate compliance terminology and language, and through our Global Partners Standards of Conduct we obtain an undertaking of compliance from those working with us or on our behalf.

Risk Identification

The energy transition's unprecedented demand for clean energy comes with an increased demand for raw material supply and elevated exposure for businesses in the renewables sector to the risk of encountering modern slavery in their supply chain.

The sector is facing increasing scrutiny in connection with human rights management within its complex value chain, most notably forced labour.

At Sonnedix, we strive for the highest standard of human rights and treat these allegations with the utmost seriousness. We are taking the following two-fold approach to minimise our exposure to forced labour and human rights abuses in our supply chain.

Outward looking:

Driving and achieving systemic change in complex supply chains requires collaborative action with other key industry stakeholders. Since 2021, Sonnedix has sponsored Solar Power Europe and Solar Energy UK's work in developing a solar-industry specific value chain assurance programme.

This collaboration between the solar associations and businesses saw, in October 2022, the launch of the Solar Stewardship Initiative (SSI). Designed to further enhance transparency and responsibility across the entire value chain, the SSI is endorsed by more than 50 solar organisations. Following the conclusion of the pilot assurance programme and public multi-stakeholder consultation, the new SSI ESG Standard, that is tailored to the needs of the solar PV sector, was published in October 2023. The SSI ESG Standard will be complemented by the SSI Supply Chain Traceability Standard in 2024. These types of initiatives, alongside regulatory actions, are key to safeguarding the global solar supply chain from human rights abuses.

Inward looking:

Sonnexix includes robust contractual provisions related to human rights in key equipment supply agreements and EPC contracts. In 2023, provisions were expanded to include more enhanced traceability requirements for key module suppliers, subjecting suppliers to traceability mapping and traceability audits, amongst other provisions. This allows us to reduce risk exposure and improve visibility across our supply chain. Suppliers continue to be vetted internally by the ESG team as part of the pre-qualification process and externally by independent third-party consultants through the audit programme. Over the course of 2023, 20 audits of our Tier 1 suppliers in Asian manufacturing hubs have been undertaken, with no major non-conformities identified. The ESG team further assesses potential exposure to human rights risks for every new acquisition for incorporation into investment decision-making. Additionally, the ESG team coordinates the internal cross-functional collaboration around this topic and, as appropriate, reports to the Senior Leadership Team and the Audit and Risk Committee on the actions that Sonnexix is taking to mitigate human rights risks.

Effectiveness

Sonnexix will assess any instances of non-compliance as they arise on a case-by-case basis and take action as required. We will only conduct business with those who fully comply with this statement or who are taking demonstrable steps towards compliance.

Training

All Sonnexix employees are provided with compliance training upon commencing employment which includes whistleblowing, covering how concerns should be raised by our employees should they suspect any wrongdoing or breaches of the law, our Codes of Conduct or policies. Furthermore, modern slavery is specifically included in the environment, social and governance training that is mandatory for all new employees.

Next Steps

Sonnexix will continue to review our internal processes to evaluate what further steps can be taken to improve our position regarding slavery and human-trafficking. We will also continue to implement training and promote improved awareness of slavery and human-trafficking across the business. The percentage of employees who have completed the modern slavery awareness training will continue to be tracked as a key performance indicator along with the number of audits of our key suppliers and concerns which relate to modern slavery or forced labour.

Furthermore, Sonnexix will continue to collaborate with other key industry stakeholders and actively participate in renewable energy industry associations' initiatives that aim to increase end-to-end transparency and sustainability across solar supply chains. A further update will be given in the 2024 statement.



Sonnexix Power Holdings Limited

Directors Name: Carlos Guinand

Title: Chairman of the Board

Date approved: June 27, 2024