

# SLAVERY AND HUMAN TRAFFICKING STATEMENT

BSR Group Holdings Limited, on behalf of itself and its subsidiaries, makes this modern slavery and human trafficking statement pursuant to section 54 of the Modern Slavery Act 2015.

We oppose slavery and human trafficking in all its forms and make this statement to set out the steps we have taken to ensure that there is no slavery or human trafficking in our business or in our supply chains.

## ABOUT US

We are a leading renewable energy developer and provider of expert services into the renewable energy industry. We develop, design, plan, construct, operate and manage high quality projects in the UK and overseas.

## OUR BUSINESS

Our business is organised into five key business areas:

- Project Development.
- Engineering, Procurement & Construction.
- Operations & Maintenance.
- Asset Management.
- Commercial Optimisation.

## OUR SUPPLY CHAINS

Our supply chains are mainly made up of the following:

- sub-contractors and consultants carrying out works on our sites;
- suppliers of the component parts of our solar parks, such as module and inverter suppliers; and
- our supplier's own supply chains.

## POLICIES

Our Anti-slavery and Human Trafficking Policy states our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. Our policy also sets out that we expect the same high standards from all of our contractors, suppliers and other business partners, and that we expect that our suppliers will hold their own suppliers to the same high standards.

## DUE DILIGENCE AND RISK ASSESSMENT

Our current assessment of risk identifies low risk of modern slavery and human trafficking in sub-contractors and consultants carrying out works on our sites. We identify a greater risk exists in the overseas based suppliers of the component parts of our solar parks where we have no direct control over activities or their own supply chain.

To help identify and monitor the risk of slavery and human trafficking in our supply chain we:

- put all new suppliers through a pre-qualification questionnaire and an approved supplier procedure (which forms a part of our Integrated Management System (IMS)), which assesses suppliers through the EcoVadis system and requests amongst other things copies of their various policies, qualifications and certificates including details of their sub-contractors;
- sanction check before large orders are placed with all companies;
- include standard provisions in all framework agreements requiring suppliers to comply with the Modern Slavery Act 2015 and all other relevant anti-slavery laws, suppliers are required to include equivalent requirements in agreements with its own suppliers; to carry out due diligence in its supply chain and maintain accurate and up to date records tracing its supply chains and to notify us of any actual or suspected slavery or human trafficking in its supply chain. We also require suppliers to warrant and undertake that it conducts its business in a manner consistent with all applicable anti-slavery practices. Our supplier agreements contain the right to terminate at will.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains through the use of World-Check along with the pre-qualification questionnaire and approved supplier procedure.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.

- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and sub-contractors and consultants comply with our values we have in place a supply chain compliance programme. This consists of:

- Conducting due diligence and audits on suppliers within our supply chains.
- Regularly reviewing and updating (where necessary) procurement policies and other existing policies and procedures relevant to Modern Slavery.
- Robust provisions within our supplier contracts with regards to Modern Slavery combined with an ability to terminate contracts at will.

## EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators ("KPIs") to measure how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- The percentage of suppliers and sub-contractors vetted for ethical labour practices.
- The number of inspections of direct suppliers and sub-contractors in our supply chains in the past year.
- The number of reported breaches in the past year.
- Percentage of staff receiving training on identifying and addressing the risk of slavery and human trafficking in our business and supply chains.

## FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- continue to oppose slavery and human trafficking in all its forms;

- provide training to all staff on the Modern Slavery Act 2015 to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business; and
- include standard provisions in all future framework agreements, appointments and sub-contracts with our consultants, contractors and sub-contractors requiring them to comply with the Modern Slavery Act 2015 and making it explicit that we reserve our rights to terminate such contracts with suppliers in the event that there is evidence of non-compliance with the Act.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2023. It was approved by the board on 19 September 2024.

**Tim Humpage**

**CEO**

**BSR Group Holdings Limited**

**Date: 19 September 2024**

