



## ContourGlobal Slavery and Human Trafficking Statement 2021

This statement relates to the financial year ending 31 December 2021 and is published pursuant to section 54 of the Modern Slavery Act 2015. It sets out the steps that ContourGlobal plc (“ContourGlobal”) has taken and continues to take efforts to ensure that no modern slavery or human trafficking is occurring within our business or supply chain.

### 1. Our Business and Organisation

ContourGlobal is a power generation company committed to new growth in low and no-carbon technologies. Since our inception in 2005, we have grown to be an internationally recognized company with technologically diverse assets and best-in-class operations.

ContourGlobal supplies electricity principally in the wholesale market, selling it under contract and regulated tariffs to those who then transmit or distribute it or sell it on to households, businesses, and others in the retail market. Our customers include national grids and utilities that supply these grids, as well as commercial and industrial customers that receive electricity, steam, water, or CO<sub>2</sub> directly from on-site facilities.

As of 31 December 2021, we had a mix of 138 power generation assets across 20 countries in Europe, Latin America, North America, and Africa. These assets have a total installed capacity of 6.3 GW. We have announced in January 2022 the sale of Brazil hydro business to Patria Investments, with the transaction expected to close in the second quarter of 2022.

The energy we generate has a positive impact for people, businesses, and communities around the world – powering cities, providing heat and light, and enabling businesses to run around the clock. Through our social investing program, we invest in making the places where we live and work better. We are proud of our positive impacts and will build on these as ContourGlobal continues to grow well.

Further details can be found in our 2021 Annual Report and on our website, <http://www.contourglobal.com>.

### 2. Policies and Processes in relation to Modern Slavery and Human Rights

We align our business with the Ten Principles of the United Nations Global Compact (“UNGC”) and, have been a signatory since 2010. These principles (“UNGC Principles”) embody our own values and commitment to participate actively and continuously in initiatives relating to human rights, labour, environment, and anti-corruption. We share the United Nations’ objectives of building a sustainable and inclusive global economy. By respecting and supporting the UNGC Principles we believe we can contribute to the Sustainable Development Goals (SDG)<sup>1</sup> that have been set up by the UN 2030 Agenda. We hope to contribute to achieving the SDG targets around responsible consumption and production and decent work and economic growth.

We are committed to maintaining the highest ethical standards, and support and respect the protection

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<sup>1</sup> SDG are a set of 17 targets to be achieved by 2030 which aim to address global challenges related to poverty, inequality, climate change, environmental degradation, peace, and justice.



of internationally proclaimed human rights. Our commitment to human rights extends to all ContourGlobal employees as well as everyone working on our sites, and indigenous and non-indigenous peoples in our communities. We adhere to international standards in all places where we operate, including the principles contained within the United Nations Universal Declaration of Human Rights, the UNGC Principles, and the United Nations Guiding Principles on Business and Human Rights.

Our Human Rights Policy Statement is communicated to our employees and sets out our commitment to assess human rights risks in our businesses and in our social investments, considering risks related to gender equality, repressive regimes, bribery and corruption, child labour, forced labour, indigenous peoples, non-discrimination, land management, health and safety, trade unions and working conditions. Although the risk of human rights breaches can be high in some countries where we operate, we manage these risks responsibly through our adoption of global standards, training, careful supplier selection, and express contractual requirements in our agreements.

In 2021, we continued to apply the principles contained in our Social Responsibility and Environmental Sustainability Policy, our Social Investment Framework, our Human Rights Policy Statement, our Health and Safety Standards, our revised Code of Business Conduct and Ethics (“Code of Conduct”), and our Supplier Code of Conduct (“Supplier Code”). As discussed further below, we also encourage our employees and business partners to raise any concerns about wrongdoing, or potential breaches of law or policy that they may have observed through the appropriate channels, either internally or through our third-party hosted EthicsLine (where concerns may be raised anonymously).

Our Compliance function, with oversight from our Audit and Risk Committee, is responsible for ensuring that effective policies and procedures are in place to manage the risk that modern slavery could occur within our business or supply chain.

### 3. Due Diligence and Supply Chain

We are committed to maintaining the highest ethical standards across our supply chain. We do this, recognizing the critical role our supply chain plays in our business and without compromising quality. All our suppliers must share our commitment. We have spoken in previous modern slavery statements about our Supplier Code, which is aligned with the UNGC Principles, as a foundation for our approach to engagement of suppliers. All our suppliers and service providers must adhere to the terms of the Supplier Code, as a condition to their initial engagement, and must continue to demonstrate compliance throughout the entire engagement lifecycle. We have also adopted a Supply Chain Due Diligence Policy that specifies the steps required to identify and assess supplier risk and creates a risk-based due diligence and approval process for all suppliers.

Additionally, suppliers and service providers must satisfactorily complete our due diligence screening.

ContourGlobal uses the Global Slavery Index to identify countries at higher risk for modern slavery concerns. Continuing efforts from prior years, we continue to use a modern slavery and human rights questionnaire where we determine a supplier presents a higher risk as to slavery and labor rights issues. This includes enquiring as to whether the third party has a policy (or policies) addressing human rights, anti-slavery minimum wage, child labour, and forced or compulsory labour. Where an adequate policy is lacking, we will not engage with the vendor until they take steps to impose policies and procedures that ensure respect of, and compliance with, these various human rights (and will not engage them should they refuse to comply). When working with smaller suppliers we will often offer to assist them with the development of these programs to help improve their compliance.

When faced with projects, such as EPC contracts, that present higher risk, we increase our level of



diligence. For example, we will require that sub-suppliers or sub-contractors, undergo our internal due diligence process, as well as imposing higher duties of diligence on the prime contractor. We include contractual provisions that allow us to monitor supplier/contractor behavior, such as enhanced audit rights. In some cases, in the past, we have included incentive provisions in contracts to reward suppliers who maintain strong anti-slavery programs and compliance.

4. Our response to allegations of human rights abuses in solar panels supply chain production in China

ContourGlobal is committed to conducting our business by doing no harm, directly or indirectly, to the communities, vulnerable social categories, employees, or the environment. Part of this commitment is reacting quickly to global developments that could impact how we do business and with whom.

In this regard, ContourGlobal has been closely monitoring information related to alleged human rights abuses against Uyghurs minority in Xinjiang region of China. Reports from multiple sources suggest that this raw material in turn is manufactured into components for photovoltaic solar panels.<sup>2</sup> In 2021 US banned imports from several Chinese raw material and polysilicon manufacturers based on their participation in actions against Uyghurs, however it has not issued sanctions against solar panel suppliers, which purchase polysilicon in the manufacturing process.

CG has conducted a thorough review of all solar panel suppliers to identify suppliers at higher risk for modern slavery violations. Based on this review and embracing the “precautionary principle”<sup>3</sup>, ContourGlobal has stopped all purchases from Xinjiang-origin solar panels for our development projects in Bonaire, Italy, and Slovakia. We have also imposed strict diligence requirements on panel suppliers outside of the region and outside of China (as even non-Chinese panels may include China sourced materials) to assure these supplies are not using Xinjiang based labour. The Company is in process of identifying alternative solar panels suppliers with production facilities outside of China.

5. Concern and Grievance Raising Procedures and Policies

As reported in our previous statements, ContourGlobal maintains an independent whistleblowing channel, our “EthicsLine”, enabling both employees and business partners to raise concerns, anonymously if they prefer (to the extent permitted under local law). In parallel, employees may also raise concerns internally, to their manager, HR, Legal or Compliance.

Posters advertising the EthicsLine remain permanently affixed in prominent locations throughout our facilities (in the local language of the location). The posters identify human rights violations as a potential concern that employees should be aware of and report. We regularly remind our people of the benefits of raising concerns, as well as our zero-tolerance policy towards any actual or threatened retaliation against anyone raising a concern. Any concerns raised, through the EthicsLine or otherwise, are thoroughly investigated and appropriate action taken.

Additionally, we have formal grievance procedures and whenever issues or concerns are raised by our stakeholders, our commitment is to address and resolve them as efficiently and effectively as possible. We seek to deal with all grievances in a timely manner. Whenever relevant and appropriate, matters arising through this process are shared with senior management.

<sup>2</sup> 45 % of world’s polysilicon supply comes from Xinjiang region and 30 % from other regions of China.

<sup>3</sup> Within the realm of environment, precautionary principle is a notion found in the seventh UN Global Compact principle whereby even in the absence of scientific consensus, a business enterprise should not pursue an action that is suspected to causing harm to the public or the environment.



At least quarterly, the Chief Compliance Officer reports to the Audit Committee on ethical concerns received, including the outcome of investigations, any disciplinary action taken, and remedial steps implemented.

In 2021, there were no modern slavery, human trafficking or any other human rights concerns reported whether internally or through EthicsLine, nor were any identified through other mechanisms.

#### 6. Training and Communication

ContourGlobal promotes awareness of our commitments to human rights and ethical behaviour through a variety of mechanisms. Employees are provided with our 'Essential Information', which includes our Code of Conduct, our Human Rights Policy Statement, our Anti-Corruption Compliance Guide, and our Anti-Corruption Policy. Further, we provide regular, targeted training to different categories of personnel.

A Modern Slavery awareness poster is available in ContourGlobal locations reminding employees to remain vigilant to signs of possible modern slavery and the obligation to report any concerns.

#### 7. Next Steps

ContourGlobal will continue to review the effectiveness of the steps we take to ensure that there is no slavery or human trafficking in our supply chains, and to address emergent risks, should they arise.

In 2021 we revised our Code of Conduct and asked all our employees to participate in a global webinar and to read and acknowledge the new Code, in which our commitment to human rights protection was reinforced. In 2022, we prepared a monthly Code training schedule in the forms of short online training sessions on key topics covered by the Code. Modern Slavery training is scheduled for July of 2022 in coordination with Global Day against Human Trafficking.

With the lifting of many COVID related limitations on travel, we will be increasing our in-person activity, including compliance risk assessments, in-person training, and site reviews. We continue our focus on Africa as this region presents a higher risk of modern slavery based on the Global Slavery Index (reporting 7.6 victims for every 1,000 people).

#### 8. Declaration

On May 13, 2022, this statement was approved by the Board of Directors of ContourGlobal plc.

Signed by,

A handwritten signature in blue ink that reads "Joseph C. Brandt". The signature is fluid and cursive.

**Joseph C. Brandt**  
Chief Executive Officer  
For and on behalf of ContourGlobal plc