

CONTOURGLOBAL



ContourGlobal Slavery and Human Trafficking Statement 2017

This statement relates to the financial year ending 31 December 2017. It is published by ContourGlobal plc (“ContourGlobal”) in compliance with section 54 of the UK Modern Slavery Act 2015 (the “MSA”). The MSA requires that certain companies provide information regarding their efforts to prevent slavery and human trafficking in their own businesses and supply chains.

1. Our Business and Organisation

Guided by our values, ContourGlobal develops, acquires, owns and operates wholesale power generation assets around the world. We focus on investing in and making the most of long-term contracted power generation in underserved markets.

As of 31 December 2017, we had a mix of 84 thermal and renewable power generation assets in 19 countries across Europe, Latin America and Africa. Our assets have a total installed capacity of 4.16 GW. The energy we generate has a positive impact for people, businesses and communities around the world – powering cities, providing heat and light for people, keeping businesses running around the clock.

We’re proud of this positive impact and want to build on it as ContourGlobal continues to grow well.

More details about the nature and structure of our business can be found on our website, <http://www.contourglobal.com>.

2. Policies and processes in relation to human rights

We are committed to upholding basic responsibilities to people and the planet, and we support and respect the protection of internationally proclaimed human rights. Our commitment to human rights extends to all ContourGlobal employees and people working on our sites, as well as 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 United Nation Global Compact (UNGC), to which we are signatories, and the United Nations Guiding Principles on Business and Human Rights.

Our commitment requires that we assess human rights risks at all our businesses and in our social investments, considering risks related to gender equality, repressive regimes, corruption and bribery, child labor, forced labor, indigenous peoples, non-discrimination, land management, health and safety, trade unions and working conditions. Although the human rights risk profile is high for some countries where we operate, we manage these risks responsibly through our adoption of global standards, training, supplier selection, and contractual protection in service agreements.

Our commitment is documented for employees and suppliers in our Social Responsibility and Environmental Sustainability Policy, our Annual Sustainability Report, our Health and Safety Standards, our Code of Business Conduct and Ethics, and our Supplier Code of Conduct, which are available to the public on our website. In addition, our Human Rights Policy Statement is included in the “Essential Information” packet provided to each new employee.

As discussed further below, we also encourage our employees and business partners to raise any concerns about wrongdoing or breaches of law or policy through the appropriate channels, including both our Grievance Process and our EthicsLine.



3. Due diligence and supply chain

To ensure that our suppliers and contractors ascribe to our business standards and principles, our suppliers and contractors sign our Supplier Code of Conduct, a code whereby they agree to adhere to ContourGlobal standards. We make it clear that while we do not expect everyone we work with to have already implemented all the best practices related to the UNGC principles, we do require them to adhere to fundamental standards in our Supplier Code of Conduct. Our engagement with suppliers and contractors begins with diligence and screening (such as reference and reputational checks, and acknowledgment of our Supplier Code of Conduct) prior to contract negotiations. If our contractors are using sub-contractors, we require those sub-contractors to adhere to ContourGlobal standards and we conduct due diligence on such sub-contractors. In 2017, ContourGlobal began using the Thomson Reuters World-Check, a screening tool that includes the capability of assessing the risks of human trafficking, forced labor and modern slavery crimes.

Some countries where ContourGlobal is located or countries where our suppliers are based (or source their labor from) are more sensitive to modern slavery and human trafficking due to the poor economic conditions, conflict zones and the lack of enforcement from the state authorities in terms of slavery and human trafficking crimes. For the risk assessment of modern slavery, ContourGlobal is using the Global Slavery Index to identify countries that are vulnerable to modern slavery and countries with a percentage of their population suffering from modern slavery¹.

In terms of business sectors, ContourGlobal has identified construction and mining as being two potential risk areas due to high risk exposure to slavery in these industries in general. ContourGlobal is currently developing a coal-fired power plant in Kosovo and refurbishing the Vorotan hydro-power plant in Armenia; these projects involve construction activities carried out by independent contractors specialized in construction works. In producing energy at some of our thermal power plants, we rely on coal which is extracted by mining companies. We conduct thorough due diligence on construction companies and coal suppliers and their sub-contractors and we engage in transactions solely with third parties that embrace our ethical standards.

Our involvement with suppliers does not end at their engagement and our diligence, it continues throughout the relationship including regular face-to-face meetings to assess the project schedule and budget and coordinate details of procurement and site management.

4. Concern and Grievance Raising Procedures and Policies

ContourGlobal has two significant procedures designed to encourage the raising of concerns and/or grievances by our employees and our business partners. We encourage a culture of openness and do not tolerate retaliation against anyone who submits a report in good faith. First, ContourGlobal employees are encouraged to raise concerns to their manager, HR, Legal, or Compliance. As an alternative, both employees and business partners are encouraged to use our whistleblower hotline, the "EthicsLine", to report observed or suspected misconduct. The EthicsLine is managed by an independent third party and allows for anonymous reporting of issues and concerns relating to ContourGlobal's policies or procedures, including any possible violations of law. ContourGlobal promptly and thoroughly investigates each such concern raised.

In addition, ContourGlobal has a formal grievance mechanism as part of its Stakeholder Engagement Plans, which are responsible for managing stakeholder relationships, including resolution of issues raised by our stakeholders. Our businesses report on targets set in the Stakeholder Engagement Plans on a monthly basis and are held accountable for failures. Where we identify issues or concerns, our commitment is to resolve them quickly and positively. Our grievance mechanism included in the Stakeholder Engagement Plans is broadly applied to all types of concerns including environmental, social, or labor concerns. In 2017, 71% of our businesses had a Stakeholder

¹ www.globalslaveryindex.org

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Engagement Plan adopted and fully implemented. All social incidents and grievances are reported on a timely basis in our incident reporting system and shared with management on a monthly basis.

As reported annually in ContourGlobal's Sustainability Report, ContourGlobal tracks the total number of Human Rights Violations, including Total Number of Incidents of Discrimination, Child Labor and Incidents Involving Indigenous Rights. Going forward, we will also track incidents of slavery and human trafficking as part of our commitment.

5. Training

ContourGlobal promote awareness of our human rights commitments through a variety of mechanisms. With respect to human rights, all new joiners are provided with ContourGlobal's Code of Business Conduct and Ethics, ContourGlobal's Anti-Corruption Compliance Guide, and ContourGlobal's Anti-Corruption Policy. Moreover, we provide ongoing targeted training to different categories of staff either face-to-face or online. In 2017, we provided 25 such in-person training sessions, which were supplemented by the online anti-corruption course that employees are required to take upon joining ContourGlobal and periodically thereafter.

6. Next Steps

ContourGlobal will continue to review the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, and assess emergent risks, if any arise, regarding slavery and human trafficking in our supply chains.

Approved by Board of Directors of ContourGlobal plc on 25 May 2018 in compliance with section 54 of the MSA.

Signed by,

A handwritten signature in blue ink that reads "Joseph C. Brandt". The signature is written in a cursive, flowing style.

Joseph Brandt
Chief Executive Officer