



## ContourGlobal Slavery and Human Trafficking Statement 2018

This statement relates to the financial year ending 31 December 2018 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 in an effort to ensure that no modern slavery or human trafficking is occurring within our business or supply chain.

### 1. Our Business and Organisation

Guided by our values, ContourGlobal develops, acquires, owns and operates wholesale power generation assets around the world.

As of 31 December 2018, we had a mix of 100 thermal and renewable power generation assets in 18 countries across Europe, Latin America and Africa. These assets have a total installed capacity of 4.3 GW. The energy we generate has a positive impact for people, businesses and communities around the world – powering cities, providing heat and light, 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’re proud of our positive impacts and will build on these as ContourGlobal continues to grow well.

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

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

Since our inception, we have endeavoured to align our business with the Ten Principles of the United Nations Global Compact (“UNGC”) and, to that end, 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.

We are committed to maintaining the highest ethical standards, and support and respect the protection 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 2018, we continued to apply the principles contained in our Social Responsibility and Environmental Sustainability Policy, our Human Rights Policy Statement, our Health and Safety Standards, our 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 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. Our Supplier Code, which is aligned with the UNGC Principles, is the foundation of our approach.

Our engagement of suppliers and service providers is contingent upon their undertaking to work to the business standards and principles contained in the Supplier Code, which is available in twelve languages, and includes a section on Human Rights and Labor:

**“CHILD LABOR:** Suppliers will comply with all applicable child labor laws and only employ workers who meet the applicable minimum legal age requirement in the country.

**FORCED AND COMPULSORY LABOR:** Suppliers will not use forced or involuntary labor, including indentured or slave labor.

**WAGES AND HOURS:** Suppliers will comply with all applicable working time laws and pay overtime when required under law. Additionally, suppliers will comply with all applicable laws on wages and benefits.”



Additionally, suppliers and service providers must satisfactorily complete our compliance due diligence screening. ContourGlobal uses the Global Slavery Index<sup>1</sup> to identify countries where modern slavery is more likely to occur. Since 2018, where an increased risk is present, a prospective supplier or service provider must complete a modern slavery and human rights questionnaire. This includes enquiring as to whether the third party has a policy (or policies) addressing physical and mental abuse, sexual or other harassment, minimum wage, child labour, and forced or compulsory labour. Where an adequate policy is lacking we will take steps to ensure that the third party respects these various human rights (and will reject them should they refuse to comply).

In terms of industries, ContourGlobal has identified construction and mining as two specific risk areas because of the heightened risk exposure to potential slavery in these industries in general. ContourGlobal is developing a coal-fired power plant in Kosovo, refurbishing the Vorotan hydro-power plant in Armenia, and re-powering wind farms in Austria. All of these projects include construction activities carried out by specialist contractors and associated sub-contractors. We ensure that these personnel adhere to the highest social standards and we select bidders for large construction projects based not only on their technical competence, but also having regard to their overall reputation, history, and commitment to anti-corruption standards.

#### 4. Concern and Grievance Raising Procedures and Policies

As reported in the previous statement, 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.

In 2018, we conducted a communication campaign supported by posters and training at our sites promoting our “speak up” culture. The posters identify human rights violations as a potential concern that employees should be aware of and report. These posters remain permanently affixed in prominent locations throughout our facilities, and we regularly remind our people of the benefits of raising concerns, as well as our strict zero tolerance policy towards any actual or threatened retaliation against anyone raising a concern. Any concerns raised, through the EthicsLine or otherwise, are promptly 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.

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.

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<sup>1</sup> [www.globalslaveryindex.org](http://www.globalslaveryindex.org)



In 2018 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.

## 5. Training

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. Moreover, we provide regular, targeted training to different categories of personnel. In 2018, training was delivered at 31 different sites; 15 in person and 16 by video-conference. This is supplemented by our online anti-corruption course, which is mandatory for all personnel who have been assigned a ContourGlobal email address<sup>2</sup>.

## 6. 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.

We regularly review and update our policies, and in 2019 an updated version of our Code of Conduct will be released. While the current version already addresses our commitment to human rights, we intend to further reinforce our zero-tolerance attitude towards slavery and human trafficking. Associated training will expressly address this important subject.

## 7. Declaration

This statement has been approved by the Board of Directors of ContourGlobal plc.

Signed by,



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

30th June 2019

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<sup>2</sup> In 2018, 1016 employees completed our online anti-corruption training course