
Modern slavery statement

May 2023



Contents

Introduction	2
Our commitment	2
Key developments in 2022	2
Our business and supply chain	2
Our governance	3
Our policies	3
Risk management	4
Training and awareness raising	5
Future plans	5
Nature of this statement	5

Introduction

Lightsource bp is a global leader in the development and management of solar energy projects and a 50:50 joint venture with bp. We are advancing the low-carbon goals of investors, utilities, corporations, and local communities worldwide and are taking urgent action to combat climate change and its impacts by offering affordable and clean energy, which aligns with the UN Sustainable Development Goals. Further details can be found at www.lightsourcebp.com.

The information in this statement, which is signed by Nick Boyle, our Chief Executive Officer, details the policies, processes, and actions Lightsource bp¹ has taken to mitigate the risk of modern slavery and human trafficking in our supply chains and any part of our own business. It covers the activities of all businesses in all jurisdictions within Lightsource bp and is our Modern Slavery Statement for the financial year ended 31 December 2022, required under the provisions of the Modern Slavery Act 2015 (the “Act”).

Our commitment

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain.

Lightsource bp is committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls that aim to ensure modern slavery is not taking place anywhere in our own business or in our supply chain, and if found, to eradicating it.

Key developments in 2022

In 2022 Lightsource bp continued our progress countering modern slavery. In particular, we:

- Launched our Human Rights Policy.
- Demonstrated sector leadership through participation in efforts such as Solar Power Europe’s Solar Stewardship Initiative.
- Conducted a supply chain ESG assessment covering over 90% of our key equipment suppliers.
- Engaged a third party to conduct over 40 on-site supplier ESG audits.
- Trained our procurement staff on modern slavery and supply chain risk mapping.

Our business and supply chain

We are a global solar energy business with activities in multiple countries across Europe, North and South America, Australia, Asia, and Africa. Lightsource bp does not provide any manufacturing services or supply raw materials to suppliers; we build and maintain our solar power plants with parts, services and equipment purchased from the third-party supply chain.

Lightsource bp sources solar panels, transformers, inverters, trackers, energy storage systems and other related materials and services either directly from manufacturers, or indirectly through our engineering, procurement, and construction (EPC) and operations and maintenance (O&M) partners.

Our governance

Our commitment to upholding human rights and eliminating modern slavery is led by our Executive Management Team and governed by the Audit Committee and Board. A member of the Executive oversees a sustainable supply chain working group, whose members include senior representatives from both operational and corporate functions. The Audit Committee governs modern slavery risk through its oversight of compliance and counterparty risks within our Enterprise Risk Management Framework.

Our policies

As we continue to expand our business, we are committed to holding ourselves to high standards and ensuring there is transparency in our own business practices and in our approach to addressing modern slavery throughout our supply chains. We expect the same high standards from all our contractors, suppliers, and other business partners. The following policies and codes form the basis of our requirements.

Human rights policy

We launched our Human Rights Policy in October 2022, clearly stating our commitment to human rights consistent with United Nations Guiding Principles (UNGPs) on Business and Human Rights, International Bill of Human Rights (IBHR) and core labour standards recognised by the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work. The policy includes an overview of how we embed this in Lightsource bp's ways of working.

Code of business conduct and ethics

Lightsource bp's Code of Business Conduct and Ethics (our "Code," available [here](#)) makes clear that we, as a business, respect the law, support universal human rights, and take great care to respect the people and cultures of the communities we work with worldwide. It sets out the principles that guide our own operations also those that apply to our business partners and counterparties.

Code of business conduct and ethics for counterparties

Lightsource bp has a separate Code of Business Conduct and Ethics for Counterparties (the "Code for Counterparties", available [here](#)) which clearly sets out the expectations and commitments of those with whom Lightsource bp does business. This includes joint venture partners and developers, vendors, suppliers, contractors, customers, land agents, service providers, consultants, and any sub-contractors thereof. Compliance with our Code for Counterparties is included in Lightsource bp's contracts and agreements. One of the key expectations and commitments contained within this Code for Counterparties is respect for the human rights and dignity of all people. Counterparties are pointed to the UN Guiding Principles on Business and Human Rights for guidance and are expected to take steps to ensure there is no use of forced or compulsory labour, human trafficking, child labour, slavery, or servitude in their business activities.

Our 'Speak Up' program

Relevant to both the Code and the Code for Counterparties is Lightsource bp's Speak Up Program which encourages those within Lightsource bp, its counterparties and any sub-contractors to speak up if they see any instances not aligned with either policy. The Speak Up Program provides several avenues for issues to be raised, including a confidential and anonymous app. Guidance on how to speak up is included in our Code and our Code for Counterparties. Lightsource bp has a zero-tolerance policy in respect of retaliation for concerns raised in good faith.

Supporting sector-wide approaches

Lightsource bp is partnering with trade bodies who are dedicated to supporting the industry on due diligence and sustainable procurement. In 2022, we chaired the Sustainable Supply Chain workstream within Solar Power Europe (SPE) and supported SPE and

Solar Energy UK (SEUK) in the launch of the Solar Stewardship Initiative (SSI). This initiative aims to provide an industry standard for supply chain due diligence, and we continue to be highly engaged in the development and pilot stages. We also have signed the Solar Energy Industries Association (SEIA) Forced Labor Prevention Pledge and support the Clean Energy Council (CEC) Pledge Against Modern Slavery. As involved members, we will seek to identify ways that aim to ensure that the rights of workers vulnerable to forced labour in global supply chains are consistently respected and promoted.

Risk management

As part of our commitment to continuously improve our ability to manage risk, including those related to human rights, we have implemented several measures to mitigate modern slavery risk. These cover the 'lifecycle' of our relationship with a counterparty, from selection, contracting, onboarding and through the life of a contract.

Communicating requirements

From the earliest stages of our engagement with potential counterparties we communicate our expectations through the Code and through greater detail in the Compliance protocol within our standard contractual clauses.

Risk-based due diligence and pre-qualification

Our selection and identification of suppliers, co-developers, vendors, and other contractors is based on a range of due diligence and pre-qualification assessments.

Various measures are applied dependent on the risk, and include:

- The use of a web-based risk intelligence database to support business decisions made prior to entering negotiations with a counterparty. This system contains information on matters such as sanctions, watchlists, and adverse media coverage that may be linked to the counterparty.
- Health, safety, and quality pre-qualification assessments, depending on the scope of work being performed.
- An ESG pre-qualification assessment covering environmental, social and governance topics including policies on human rights and labour standards. This is managed in cooperation with a third party and provides a community model, which develops and defines best practices, by connecting buyers and suppliers, streamlines procurement and raises standards specific to the renewables industry. A risk indicator is then generated, which weights, ranks, and classifies suppliers. In 2022, we chose to complete this assessment across over 90% of our key equipment suppliers as part of a baseline exercise.

If we discover non-conformances during due diligence or qualification, we take steps to further understand them and instigate mitigations as appropriate. Suppliers have an important role in developing improvement plans which are jointly monitored to closure. The findings inform counterparty selection as well as ongoing oversight.

Contractual obligations

From the earliest stages of our engagement with potential counterparties we communicate our expectations through the Code and through greater detail in the Compliance protocol within our standard contractual clauses.

Ongoing management

We may deploy a range of measures for ongoing oversight of the counterparty, informed by the due diligence and pre-qualification described above. For example, we or a third-party firm may undertake site-based audits if needed. As part of our baseline exercise, we, through a third-party, conducted over 40 ESG on-site audits in 2022. Non-conformances identified as part of this process inform supplier management, supplier selection for future work, and future audit plans.

If we identify instances of modern slavery or human trafficking, we will take suitable action which may include terminating discussions and/or existing relationships with the counterparty in question and notifying relevant authorities of the issues involved.

Training and awareness raising

Lightsource bp provides training on our values, Code of Business Conduct and Ethics which underpins and reinforces the elements of our human rights commitments. We strive to effectively manage risks to our workforce and engage contractors on this important issue. We continue to develop the appropriate capability and resources for our operational teams and support them with expert technical guidance.

Follow-up training is primarily aimed at people who work on solar projects, in operational roles and in functions such as human resources, legal and ethics and compliance.

In 2022, we also provided training to those in procurement roles on modern slavery, supply chain risk mapping and sustainable procurement.

Future plans

Lightsource bp recognizes, in common with its peers, adjacent markets, and other industry sectors, the importance of accurate and timely information to inform our business decisions. We will continue to work with our trade bodies, government actors, and interested stakeholders to improve the quality, visibility, and accuracy of data throughout a complex supply chain essential to the continued ethical, transparent development of alternative energy sources. Over the coming year, we intend to:

- Expand the ESG supplier pre-qualification screening to key services suppliers.
- Work with our supply chain partners and monitor delivery of their improvement plans.
- Further refine our supply chain risk mapping.

Nature of this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2022. It was approved by the Board of Directors in line with the Modern Slavery Act on 5 May 2023.

