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# Modern Slavery Statement



## 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](http://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 bp<sup>[1]</sup> 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 2021, 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 2021

In 2021 Lightsource bp took further steps in our progress countering modern slavery:

- We engaged a third-party firm to perform an assessment of our existing processes and procedures on human rights, including that of modern slavery, and to make recommendations on strengthening our own due diligence and related processes.
- We introduced human rights and related questions into our supplier qualification processes, which are used to inform supplier selection.
- We worked with industry groups to develop a sector-wide approach to due diligence protocols.
- We conducted awareness raising for all employees, including a ‘town-hall’ session led by the CEO, and a deep dive briefing to impacted staff from the Head of Procurement
- We initiated traceability audits for high-risk suppliers to provide greater visibility of the material manufacturing supply chain.

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[1] Lightsource BP Renewable Energy Investments Limited (incorporated in England with company number 09494479) and its wholly owned subsidiaries. The full list of subsidiary undertakings of the company are listed in the group of companies’ accounts filed at HMRC Companies House.

## 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 and other related materials and services either directly from manufacturers, or indirectly through our engineering, procurement, and construction (EPC) partners or co-development 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.

### 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 and 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

Additionally, Lightsource bp is partnering with trade bodies who are dedicated to supporting the industry on due diligence and sustainable procurement, including Solar Energy Industries Association (SEIA) and Solar Power Europe (SPE). 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 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 pre-qualification assessment covering multiple criteria, including but not limited to workforce conditions and health and safety performance of the suppliers and their supply chain.

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.
- Supplier and contractor pre-qualification questionnaires managed in cooperation with third party certification consultants. This 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.

If we discover 'red flags' during due diligence or qualification we take steps to further understand them and where possible put in place mitigating actions. The findings inform counterparty selection as well as ongoing oversight.

## Contractual obligations

Counterparties involved in the development, construction, and operation of a Lightsource bp solar plant are contractually required to comply with our Code of Business Conduct and Ethics for Counterparties and are required to only use sub-contractors that agree to comply with the Code of Business Conduct and Ethics for Counterparties. Compliance terms are included in our contractual agreements with counterparties. These obligations also require counterparties to pass down the requirement of compliance with our Code for Counterparties or equivalent standards throughout their supply chain.

## 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 consultant may undertake desktop or site-based audits if needed. 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.

## 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:

- Within Lightsource bp, build greater awareness of potential modern slavery and human rights risk and speak-up channels available
- Continue to strengthen the due diligence we apply to high-risk suppliers
- Work with industry to finalise appropriate sector-wide standards
- Continue to engage and manage existing suppliers, including progressing gap closure plans where needed



## 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 2021. It was approved by the Board of Directors in line with the Modern Slavery Act on 27<sup>th</sup> June 2022

Signature of director:



LIGHTSOURCE BP RENEWABLE ENERGY INVESTMENTS LIMITED

Date: 27th June 2022