

Anti Modern Slavery Policy



1. Purpose and Scope

The purpose of this Anti Modern Slavery Policy (the AMSP) is to communicate and establish controls to ensure compliance with all anti modern slavery and human trafficking regulations as well as ensuring alignment to the ethical standards and Compliance Policy of GOLDBECK SOLAR and its group companies.

The AMSP covers all GOLDBECK SOLAR group company employees, suppliers and third-party providers and is intended to ensure all are aware of the responsibilities they hold. We also have our comprehensive Compliance Policy, which is relevant to modern slavery and should be read in conjunction with and supplement this AMSP.

2. Occurrence of Modern Slavery

Modern Slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, servitude, forced compulsory labor, bonded and child labor and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The latest International Labour Organisation (ILO) estimates show there are an estimated 160 million children in child labor, and an estimated 27.6 million children and adults in forced labor globally. As product manufacturing and distribution supply chains are often complex, we must ensure we address the eradication of modern slavery throughout our entire supply chain and not just focus on the end product.

3. Our Policy

Our policy does not allow for any form of modern slavery or human trafficking and we will take proactive steps to ensure that no acts typically considered modern slavery are taking place in any part of our business or supply chains.

We will not engage with organizations which facilitate any form of modern slavery, including without limitations the use of child labor or forced labor as recommended by the ILO, or which do not recognize freedom of association or collective bargaining.

We require that the suppliers and third parties we work with should hold their own suppliers and contractors to the same standards.

We seek to continually improve awareness of the practices necessary to combat modern slavery and human trafficking and assess the risk profile of our business in these areas.

In addition to the above, our zero-tolerance approach to modern slavery includes our commitment that:

- we will comply with all relevant laws, statutes and regulations relating to modern slavery;
- we will publish Modern Slavery Statements in accordance with the relevant legislation;
- we will seek to educate and raise awareness across our business in the identification and reporting of modern slavery.

4. Compliance

We are committed to the prevention, detection and reporting of modern slavery in any part of our business or supply chain.

By applying our separate Compliance Policy to employees at all levels of the GOLDBECK SOLAR group, we ensure compliance with anti-modern slavery measures across our organization, including directors, officers, agency workers, seconded workers, volunteers, and interns at all times.

We have a robust governance structure in place, including a separate Supplier Code of Conduct for suppliers and third-party providers, which we implement in our supply chain using reasonable commercial efforts, and take a risk-based approach to our contracting processes which are then kept under review. We ensure compliance with this anti-modern slavery policy with suppliers and third-party providers by:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- implementing a general approach as to evaluating the modern slavery and human trafficking risks of each new supplier or subcontractor;
- where necessary, conducting supplier audits or assessments, either through our own staff or third-party auditors, where general risks are identified;
- creating an annual risk profile for each supplier;

- being an active member in the PV industry associations "Bundesverband der Solarwirtschaft" and "Solar Power Europe" and closely follow up on alerts regarding potential modern slavery activities; and
- invoking sanctions against suppliers that fail to improve their performance in line with our requirements on anti-modern slavery or that seriously violate our separate Supplier Code of Conduct, including the termination of the business relationship.

We use commercially reasonable efforts to retain the right to audit our suppliers' or and third-party providers' activities and where practical, relationships, both routinely and at times of any reasonable suspicion.

If we find that any of our suppliers or and third-party provider have breached our requirements relating to anti-modern slavery and human trafficking, we will ensure that we take appropriate action.

Any employee who breaches our Compliance Policy may face disciplinary action, which could result in dismissal for misconduct in accordance with the applicable labor legislation.

5. Reporting Modern Slavery

Employees, suppliers and third-party providers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of the anti-modern slavery provisions applicable to them.

All employees of the GOLDBECK SOLAR group are encouraged to report any incidence or suspicion of modern slavery and / or human trafficking in any part of our business or supply chain to any line manager up to the CEO, and they have the choice to anonymously report to a third-party reporting platform GOLDBECK SOLAR is a member of. Any supplier or third-party provider can report any such suspicion to its Category Manager or business contact with the GOLDBECK SOLAR group, and they also have the choice to anonymously report Whistleblower Channel.

We encourage openness and will support anyone who raises genuine concerns in connection with modern slavery and / or human trafficking, even if they turn out to be mistaken. Any reports are treated confidential and acted upon as appropriate.

6. Responsibility and Implementation

Our Board of Directors has overall accountability for ensuring that this policy complies with our legal and ethical obligations, and that all our people comply with it.

The Head of Procurement is responsible for the policy implementation within our supply chain and appropriate communication of the goals and contents this policy to all relevant suppliers and third-party providers.

This policy is available on the GOLDBECK SOLAR group website www.goldbecksolar.com and will be reviewed on an annual basis or as required in accordance with any updates to relevant legislation.

