

## MODERN SLAVERY STATEMENT

### INTRODUCTION

GOLDBECK SOLAR has taken necessary steps to prevent modern slavery and human trafficking in our operations and supply chains during the financial year 2024. According to section 54(1) of the UK Modern Slavery Act 2015, we communicate the commitment established in our overarching Anti Modern Slavery Policy and our Compliance Policy. We adhere to a zero-tolerance approach to modern slavery, which is explicitly defined as encompassing slavery, servitude, forced labor, bonded and child labor, and human trafficking, all of which involve the deprivation of a person's liberty for exploitation. Recognizing the inherent complexity of global product manufacturing and distribution supply chains, we are dedicated to ensuring ethical and good industry practices and respect for fundamental human rights throughout our business, focusing on the eradication of modern slavery in all its forms. This statement applies exclusively to GOLDBECK SOLAR (UK) Ltd. and its operations within the United Kingdom, in accordance with the UK Modern Slavery Act 2015, shall also be reviewed annually to ensure continued relevance and compliance with evolving legal and ethical standards, and shall be governed by and construed in accordance with the laws of England and Wales.

### CORPORATE FRAMEWORK AND SUPPLY CHAIN CONFIGURATION

GOLDBECK SOLAR, having its parent company based in Germany and having various companies within Europe and internationally, is a leading contributor to the global clean energy transition, managing solar photovoltaic (PV) systems from initial design through long-term operation. The company has approximately 500 employees worldwide and operates as a dynamic group, including its subsidiary, GOLDBECK SOLAR (UK) Ltd, in the United Kingdom. The corporate structure of GOLDBECK SOLAR includes directors, officers, employees, and various caliber contracted workers, all operating and governed under a clear internal framework that defines roles, responsibilities, and ethical expectations. The management of GOLDBECK SOLAR ensures that these standards are consistently applied across the group, providing training, guidance, and internal reporting mechanisms to support transparency, accountability, and operational integrity at all levels of the organization.

GOLDBECK SOLAR is committed to conducting business ethically and responsibly, with a particular focus on preventing modern slavery and human trafficking. This commitment is formalized in GOLDBECK SOLAR Anti-Modern Slavery Policy, which applies to all employees, suppliers, and third-party providers. The company enforces a strict zero-tolerance approach to worker exploitation across its multi-country supply chain. To support this, we implement risk-based due diligence measures, including supplier assessments, contractual obligations, and continuous monitoring, with enhanced scrutiny for high-risk suppliers. GOLDBECK SOLAR's approach ensures that ethical standards are maintained not only in product-related supply chains but also among service providers supporting our customer offerings. Through robust governance, ongoing employee training, supplier engagement, and transparent reporting mechanisms, GOLDBECK SOLAR demonstrates its commitment to human rights, effectively manages risk, and strengthens its position as a responsible and reliable participant in the global clean energy transition.

### DEFINITIVE COMMITMENT TO HUMAN RIGHTS

GOLDBECK SOLAR maintains a strict zero-tolerance approach to modern slavery and human trafficking, with its organization and the supply chain thereby making this ethical commitment a core part of its corporate governance. This commitment is formally codified in GOLDBECK SOLAR Anti-Modern Slavery Policy, which establishes a robust governance and control system and a binding effect across the entire organization. The policy applies to all personnel, including directors, officers, employees, agency workers, and interns, and is reinforced by a comprehensive Compliance Policy.

Together, these policies ensure adherence to national and international labor and human rights laws and include provisions against corruption, illegal employment, and other unethical practices. Our management is strictly enforcing these standards in daily operations and decision-making, demonstrating that accountability for human rights extends to the highest levels of the organization. Any failure to comply with the Anti-Modern Slavery Policy shall be subject to enforcement measures at the sole discretion of GOLDBECK SOLAR.

Hence, GOLDBECK SOLAR enforces a mandatory Supplier Code of Conduct, which requires all suppliers and third-party partners within its supply chain to uphold the same zero-tolerance stance against forced labor, child labor, and violations of workers' rights, including freedom of association and collective bargaining in line with ILO core standards. Suppliers must agree on comparable regulations with their supply chain, ensuring ethical compliance deep into multi-tiered supply chains. This approach is particularly important in high-risk areas, such as the polysilicon supply chain and the use of third-party service providers for construction. GOLDBECK SOLAR framework is further supported by an accessible Whistleblower Policy, which allows employees, supply chain, and its stakeholders to report concerns on a confidential basis, ensuring prompt investigation and remediation. Collectively, all these measures create a robust governance framework that safeguards human and labor rights, mitigates risks, and reinforces GOLDBECK SOLAR as a responsible and trustworthy partner in the global clean energy transition.

## **SUPPLY CHAIN AND DUE DILIGENCE PROCESS**

GOLDBECK SOLAR operates a structured due diligence framework designed to prevent modern slavery and human trafficking risks across its global operations and supply chains. Before entering a contractual relationship, suppliers and subcontractors, we verify data from the last assessment, which considers country exposure, industry, and product group vulnerabilities, as well as prior knowledge and historical performance data. Where suppliers are categorized, in accordance with GOLDBECK SOLAR's internal process, as medium or high risk, an in-depth, concrete risk analysis is conducted. This analysis draws on recognized human and labor rights indices, supplier self-disclosures, and internal assessment logic covering probability of occurrence, contribution to causation, and the extent of influence GOLDBECK SOLAR can exercise. In this respect, all business partners are mandatorily required to comply with the Supplier Code of Conduct, which prohibits forced labor, child labor, human trafficking, and the denial of freedom of association or collective bargaining rights. To ensure enforceability, all supplier contracts reserve the right of GOLDBECK SOLAR at its sole discretion to conduct periodic or ad hoc reviews, either directly or through appointment of accredited third parties, including in cases where reasonable suspicion arises.

GOLDBECK SOLAR procedures set out adequate preventive and corrective measures that may include, but not be limited to, training aligned with international labor standards, closer monitoring and engagement with at-risk suppliers, and the strict enforcement of contractual obligations, including the possibility of terminating contractual relationships if breaches are not remedied within a prescribed timeline. In parallel, a whistleblower and complaint mechanism is also available to employees, suppliers, and external stakeholders, providing a confidential and accessible channel to raise concerns. Every substantiated report triggers an immediate risk analysis and remediation process. More importantly, GOLDBECK SOLAR ensures that potentially affected persons are included in surveys, dialogue sessions, and feedback mechanisms, allowing their perspectives to shape mitigation strategies. The outcomes of risk assessments, corrective actions, and ongoing improvements are communicated effectively, reflecting the company's commitment to responsibility, continuous improvement, and full compliance with the requirements of the UK Modern Slavery Act.

## RISK ASSESSMENT AND MANAGEMENT

GOLDBECK SOLAR is also committed to the continuous identification, assessment, and mitigation of potential modern slavery and human trafficking risks throughout its global value chain within its supply chain, both upstream and downstream. Our risk identification process begins with a comprehensive mapping of the supply chain to evaluate product-specific and geographic vulnerabilities, as well as the potential risks associated with subcontracting tiers. Each supplier is assessed using a combination of qualitative and quantitative criteria on a case-by-case basis, and an annual risk profile is produced to formalize findings, and informed mitigation measures are set. To address sector-specific and emerging risks, the company actively participates in industry associations, including the Bundesverband der Solarwirtschaft and Solar Power Europe, allowing close monitoring of threats, alerts, industry trends, and best practices regarding modern slavery. To manage the extensive supply chain and address geopolitical and reputational risks, GOLDBECK SOLAR enforces a mandatory compliance with the prevalent Supplier Code of Conduct, which is aligned with the Code of Conduct of the Solar Stewardship Initiative (SSI), ensuring consistency with internationally recognized human rights and labor standards. Risk assessment is not static; it is continuously updated to reflect changes in supplier operations, geopolitical developments, and sector-wide intelligence.

GOLDBECK SOLAR manages identified risks through a structured framework of due diligence, monitoring, and enforcement. All suppliers are required to comply with the Supplier Code of Conduct, which prohibits forced labor, child labor, and infringements on workers' rights, including freedom of association and collective bargaining. The suppliers must cascade these standards through their subcontracting networks, ensuring ethical compliance deep into multi-tiered supply chains. Enforcement measures shall include, but not be limited to, corrective action plans, increased monitoring, and, in cases of serious or repeated breaches, termination of the business relationship, reporting to relevant authorities, suspension of business relationships, or other appropriate remedial measures deemed necessary to uphold our zero-tolerance stance on modern slavery and human trafficking. Internally, employees are trained to recognize and report modern slavery risks, and the Compliance Policy establishes that breaches may result in disciplinary action, up to and including dismissal. Additionally, the Whistleblower Policy provides a confidential channel for reporting suspected violations, ensuring rapid investigation and remediation. By combining robust risk assessment, proactive supplier engagement, internal controls, and clear enforcement procedures, GOLDBECK SOLAR effectively mitigates human rights risks while maintaining ethical, responsible, and transparent operations throughout its value chain.

## PERFORMANCE MEASUREMENT METRICS

GOLDBECK SOLAR shall periodically, at its sole discretion, monitor and report on a defined set of key performance indicators (KPIs) to evaluate the effectiveness of its modern slavery and human trafficking risk management framework. These KPIs cover external supply chain performance, including the proportion of direct suppliers undergoing due diligence checks, the number and percentage of suppliers identified as high-risk, and the number of reviews conducted across the chain, whether on-site or remote. The coverage of these reviews, including mitigation and remedial measures, follow-up actions, shall serve as a benchmark for supplier compliance. GOLDBECK SOLAR will also track the extent of supply chain mapping, identifying whether risks have been assessed at different levels, thereby strengthening transparency and oversight of potential risk areas.

Alongside supply chain monitoring, internal KPIs will assess compliance, awareness, and incident management within the organization. This includes the percentage of employees in critical functions such as procurement, project management, advisory units within the organization, and site operations who have completed training on modern slavery risks. Additional measures include the number of violations or confirmed cases of non-compliance, with recognition that a "zero" figure is equally

meaningful, and the corrective actions taken in response to violations, such as supplier remediation plans, sanctions, or contract terminations. Engagement with internal reporting mechanisms, including the whistleblower system, will also be tracked to ensure issues are promptly identified and addressed. Together, these metrics create a transparent, quantifiable system that demonstrates GOLDBECK Solar's accountability and reinforces its commitment to eradicating modern slavery throughout its operations and global supply chain.

| KPI  | Measurement   | 2024 Data |
|--|---|-----------|
| Proportion of Suppliers with Due Diligence | <i>Percentage of direct suppliers (assessed for modern slavery and human trafficking risks)</i>                               | 100%      |
| Number of High-Risk Suppliers              | <i>Percentage of suppliers identified as high-risk (based on geography, sector, or subcontracting tiers)</i>                  | 0%        |
| Actions                                    | <i>Number of actions taken on suppliers (including follow-ups on corrective actions)</i>                                      | 62        |
| Training Rate                              | <i>Percentage of employees in procurement and relevant areas who were trained on modern slavery awareness and reporting</i>   | 100%      |
| Identified Violations / Cases              | <i>Number of confirmed violations of anti-slavery policies</i>  | 0         |
| Measures Taken in Event of Violations      | <i>Number of corrective measures implemented (including supplier engagement, remediation plans, or contract terminations)</i> | 0         |

## WORKFORCE CAPABILITY AND AWARENESS

We are committed to fostering a culture of compliance by building the capability and awareness of the GOLDBECK SOLAR workforce. GOLDBECK SOLAR's commitment includes seeking to educate and raise awareness across our business in the identification and reporting of modern slavery. Supervisors are directly responsible for ensuring that employees in their respective areas of duty and responsibility are aware of the Compliance Guidelines, which include anti-modern slavery measures. The company provides robust reporting mechanisms to the employees, suppliers, and third-party providers, who must not fail to report any activity that might lead to a breach. Employees can report suspicion to any line manager up to the high-level management. Suppliers and employees have the choice to report anonymously at [whistleblower.goldbecksolar.com](mailto:whistleblower.goldbecksolar.com). We assure openness, treat all reports confidentially, and support anyone who raises genuine concerns.

## LOOKING FORWARD

GOLDBECK SOLAR recognizes the need to continuously review and adapt our processes to ensure the ongoing prevention of modern slavery and human trafficking. As GOLDBECK SOLAR's operation, supply chains, and geographic markets evolve, we will continue to refine our risk assessments to identify potential human rights risks and ensure robust mitigation strategies. We are committed, both now and in the future, to acting ethically and with integrity in all our business dealings. Our due diligence and procurement processes for engaging new suppliers and third-party partners are regularly reviewed, particularly as we expand into new markets. Where improvements are identified that strengthen our existing processes, we will implement them as appropriate, while continuing to build awareness and understanding of modern slavery and associated issues throughout our workforce and supply chain. This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and represents GOLDBECK SOLAR (UK) Ltd's statement on slavery and human trafficking for the financial year 2024.

**Colin Deans,**  
*Country Manager*  
**GOLDBECK SOLAR (UK) Ltd**