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# MODERN SLAVERY ACT 2015 SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 DEC 2019

## Introduction

Lightsource bp is a global market leader in the development, acquisition and long-term management of large-scale solar projects and smart energy solutions. Our projects generate competitively-priced, dependable, clean energy for businesses and communities.

We are headquartered in London, United Kingdom. Further details can be found at [www.lightsourcebp.com](http://www.lightsourcebp.com).

## Lightsource bp's policy

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 in order to exploit them for personal or commercial gain.

Lightsource bp has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or, where relevant, in any of our supply chains.

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 tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

## Our supply chain

Lightsource bp does not provide any manufacturing services or supply the materials required to develop, operate or maintain solar sites. Occasionally, as part of our business activities, we will source solar panels, trackers and other related materials directly from solar manufacturers. These manufacturers are primarily companies based in China. In the majority of cases however, the solar panels for the projects we manage are procured by a third-party co-developer.

## Policies

Lightsource bp's Code of Business Conduct and Ethics (the **"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. This Code clearly sets out that the principles contained within it to guide our own operations also apply with respect to our business partners and 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, including joint venture partners, developers, vendors, contractors, customers, land agents, service providers, consultants and any sub-contractors thereof. One of the key expectations and commitments contained within this Code for Counterparties is respect for the human rights and dignity of all peoples. Counterparties are pointed to the UN Guiding Principles on Business and Human Rights for guidance and 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.

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. You can find guidance on how to speak up in our Code and Code for Counterparties. Lightsource bp has a zero-tolerance policy in respect of retaliation for concerns raised in good faith.

Throughout the next 18-months, Lightsource bp is developing and launching a Sustainability Strategy which includes a pillar on Human Rights. This will be led by our Sustainability Strategy Team and sponsored by our Chief Operating Officer.

## Risk management and due diligence

In 2019, as part of our commitment to continuously improve our ability to manage risk, including those related to Human Rights, we launched two core elements to our support our compliance risk management programmes.

The first was the launch of a Global Counterparty Risk Management Policy and Procedure (the **"CRM Policy"**) which provides the organisation with clear guidance on how to conduct due diligence on our counterparties, including their compliance with modern slavery and other human right laws and regulations. This policy includes guidance on:

- The use of our new web-based legal compliance system to support managing various areas of compliance risk, including Human Rights.
- Adoption of a Counterparty Due Diligence Programme:

Lightsource bp has adopted a risk-based approach to conducting due diligence on our counterparties. The Risk Matrix takes into consideration several data points related to the services the counterparty would provide LSbp, including but not limited to the type of counterparty and the jurisdiction of their business. Depending on the risk profile of the counterparty, varying levels of due diligence will be conducted based on if they present low, medium or high legal compliance risk to the organisation. This will ensure the greatest time and attention are spent on those counterparties who represent a higher risk. Companies acting as suppliers or co-developers in relation to projects managed by Lightsource bp are screened and selected carefully, using a transparent selection process based on objective criteria and evidence.

Lightsource bp contracts an external provider to conduct third party due diligence, based on research of publicly available information on the counterparty, covering 23 different areas. This diligence includes an assessment of whether the counterparty has been found or alleged to be involved in modern slavery and human trafficking-related activities, based on media coverage, claims and litigations faced and fines or penalties incurred. The process also searches for where there is evidence of positive engagement by the counterparty on this and the other 22 topics covered as part of the process.

- incorporating compliance terms into our contractual agreements with third parties that they will conduct their own due diligence on any subcontractors they use, including suppliers and those providing construction, permitting and licensing services.

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. Where a counterparty does not have suitable controls in place to prevent slavery and human trafficking, we will consider whether we can work with them to implement improvements.

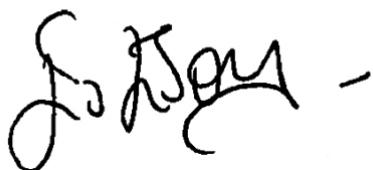
## Training and awareness

An initial training was launched in 2019 as part of our Code and Code for Counterparties training to provide a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business. In line with our Sustainability Strategy, we will be rolling out more comprehensive training across the organisation over the next 12-18 months.

## 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 2019. It was approved by the Board of Directors in line with the Modern Slavery Act on 30th September 2020.

SIGNATURE OF DIRECTOR



LIGHTSOURCE BP RENEWABLE ENERGY HOLDINGS LIMITED

Date: 30/09/2020