

# Solar Century Holdings Limited Modern Slavery and Human Trafficking Statement

## INTRODUCTION FROM THE CHIEF EXECUTIVE OFFICER

Solar Century Holdings Limited and its subsidiaries (the “Company”) acknowledges the fact that modern slavery and human trafficking occurs in many countries. The Company does not accept modern slavery or human trafficking and works actively against it. The complexity of the modern slavery and human trafficking issue requires a consistent, long-term effort to create sustainable and broad-based solutions to reach the Company’s goal; that no products or services delivered to the Company are produced by modern slavery or as a result of human trafficking.

The Company respects different cultures and values in countries where it operates and sources its products but does not compromise on the basic requirements regarding modern slavery and human trafficking.

The Company has a Modern Slavery and Human Trafficking Policy, which has been established to make the Company’s position clear to suppliers and their co-workers, as well as any other parties.

## STRUCTURE

The Company is a global photovoltaic solar developer and installer with its head office located at 90 Union Street, London, SE1 0NW. The Company employs over 200 employees worldwide and operates in Europe, Latin America, Central America and Africa.

## SUPPLY CHAINS

The Company works closely with suppliers to uphold proper practices in supply chains and informs its suppliers of its strict standards and zero tolerance approach to modern slavery and human trafficking. The Company’s supply chains include suppliers of goods and services mainly from Europe and China, required to install photovoltaic solar projects.

## POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING

The Company is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. The Company’s Modern Slavery and Human Trafficking Policy details its commitment to acting ethically and with integrity in all of its business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in its supply chains.

Please find link to the Company’s online Procurement Policy with further details:

<https://www.solarcentury.com/procurement-policy/>

## DUE DILIGENCE PROCESSES FOR MODERN SLAVERY AND HUMAN TRAFFICKING

As part of the Company’s initiative to identify and mitigate risk, it undertakes due diligence in respect of its suppliers to check that they take the appropriate measures to ensure that no modern slavery or human trafficking occurs at the suppliers’ and their sub-contractors’ places of production. The Company has in place systems to:

- Identify and assess potential risk areas in its supply chains.
- Mitigate the risk of modern slavery and human trafficking occurring in its supply chains.
- Monitor potential risk areas in its supply chains.
- Protect whistle blowers.
- If modern slavery is found, the Company will terminate all business with the supplier concerned.

#### **SUPPLIER ADHERENCE TO THE COMPANY'S VALUES**

The Company undertakes a risk identification audit in respect of suppliers it intends to use and if they are deemed to represent a risk they are black listed. This audit includes:

- The supplier displaying an open and honest attitude to their business practices
- The Company having visited and/or audited the supplier
- The supplier having ISO, OHSAS accreditation where relevant
- The supplier having a CSR policy
- The supplier having a published Code of Conduct
- The Company having a long term business relationship with the supplier with many 'touch-points'
- The supplier being a large multinational and/or listed on LSE/Nasdaq etc.

#### **EFFECTIVENESS IN COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING**

During a supplier selection period, the Company chooses suppliers that are respected, bankable and with a good reputation.

The Company further maintains safeguards against modern slavery and human trafficking in its supply chains by taking the following steps:

- Training as part of a company employee's induction - As part of the induction process new starters are made aware of the policy and given training on understanding the potential risks and indicators.
- Ongoing Awareness - For those on site or doing factory audits the COO delivers periodic updates to remind employees of their responsibility as the eyes and ears of the organisation. Any concern about the treatment of construction teams or factory workers by the Company's suppliers and contractors must be reported to the COO or Regional Operations Director.
- Company update and refresher - On an annual basis the Procurement Director/Procurement Department provides an overview of the policy, an explanation of the risks and a review of changes in the supply-chain / risk profile to employees that have procurement responsibilities to maintain awareness and to minimise risks.
- Strategic Supplier Development - Through long term strategic partnerships with vendors and contractors the Company will seek to know each supplier to help reduce the risk of missing possible indicators or employee mistreatment.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's modern slavery and human trafficking statement for the financial year ending 2020.

The Company's Board of Directors approved this statement on 21 April 2020.

A handwritten signature in black ink, appearing to be 'F. van den Heuvel', written over a faint horizontal line.

Signature:

Name: Frans van den Heuvel

Solar Century Holdings Limited

Date: 21 April 2020