

# Modern Slavery Statement 2025

This statement is published by Sonnedix Power Holdings Limited, on behalf of its subsidiary Sonnedix UK Services Limited, pursuant to section 54 of the UK Modern Slavery Act. It sets out the steps taken by Sonnedix Power Holdings Limited and its subsidiaries (collectively "Sonnedix") during the financial year 2024 to prevent and eradicate forced labour and human trafficking in Sonnedix's global operations and supply chains.

## Our Business

Sonnedix is an established Renewable Energy Producer with a proven track record of successfully designing, financing, building and monitoring high-performance, cost-competitive renewable energy projects around the world.

At the close of 2024, the Sonnedix corporate structure included multiple entities in and 592 employees across Chile, the United States of America, France, Spain, Italy, Germany, Poland, Portugal, the Netherlands, the United Kingdom, and including employees of our trusted Japanese development partner, Sonnedix Japan K.K. Sonnedix had a total capacity of 10,926 MW of which 3,552 MW were operational/mechanically complete, 1,353 MW were under construction, and a further 6,021 MW were under development.

The majority of Sonnedix employees are office or project based, as a result the key risk area for modern slavery is within the procurement and supply chain activities undertaken through a limited number of global partners and suppliers.

## Our Policies

Integrating responsible, forward-thinking corporate policies into our daily business practices is key to us achieving our purpose to power a bright future. It's what allows Sonnedix to behave sustainably, ethically and accountably as we develop, finance, build and operate renewable energy projects around the world. It's also what ensures that Sonnedix has a positive impact on our people, the environments, and communities within which we work.

Sonnedix has zero-tolerance for the use of child or forced labour on our projects or plants and we will not knowingly do business with contractors, subcontractors, business partners or vendors who violate these practices or the human rights of those working on their behalf.

Our commitment and zero-tolerance approach is detailed in the Sonnedix Social Policy and Standards document, namely in the Human Rights, Child and Forced Labour Standard (refer to [https://www.sonnex.com/wp-content/uploads/2020/04/2020\\_SX\\_ESG-Social-Policy-and-Standards.pdf](https://www.sonnex.com/wp-content/uploads/2020/04/2020_SX_ESG-Social-Policy-and-Standards.pdf)). We expect the same zero-tolerance approach from those who undertake work on our behalf and these expectations are set out in the Sonnedix Responsible Supply Chain Design and Procurement Standard.

In addition to the Sonnedix Social Policies and Standards detailed above, our commitment is underpinned in the following governance policies and standards (refer to [https://www.sonnex.com/wp-content/uploads/2020/04/2020\\_SX\\_ESG-Governance-Policy-and-Standards.pdf](https://www.sonnex.com/wp-content/uploads/2020/04/2020_SX_ESG-Governance-Policy-and-Standards.pdf)).

- Sonnedix Governance Policy,
- Sonnedix Whistleblowing Policy,
- Sonnedix Third Party Grievance and Communications Standard,
- Sonnedix Contractor HSEC Management Standard,
- Sonnedix Global Partners Standards of Conduct, and
- Sonnedix Code of Ethics and Business Conduct.

Sonnedix is committed to the highest ethical standards in our work and in our interactions with customers, suppliers, utilities, co-investors, peers and our community. An important aspect of accountability and transparency is a mechanism to enable all individuals to voice concerns in a responsible and effective manner when they discover information that they believe shows wrongdoing.

In 2024, we introduced a new Whistleblowing channel, the Speak Up Ethico hotline and web portal, providing employees and external stakeholders with a confidential third-party channel to report concerns regarding potential wrongdoing in the workplace.

## Due Diligence

Sonnedix conducts comprehensive due diligence on its high risk third-party engagements, including on its suppliers, construction contractors and plant operators. This due diligence process includes a review of, among other things:

- Global commercially provided databases,
- Government lists, and
- Media reports.

In 2024, our Ethics and Compliance function introduced Dow Jones RiskCenter Third Party, a global third-party risk management tool, to enhance our compliance due diligence process when selecting the right business partners for Sonnedix. In addition, our contractual documentation includes appropriate compliance terminology and language, ensuring those working with us or on our behalf commit to compliance.

## Risk Identification

We have identified our supply chain as the most material risk in this area that there is elevated exposure for businesses in the renewables sector to the risk of encountering modern slavery and conflict minerals in their global supply chains. This was confirmed in our refreshed ESG topic materiality assessment undertaken in 2024, where this topic is recognised as material. Specifically, we recognise that the solar PV supply chain is vulnerable to potential abuses, given the well publicised allegations of forced or child labour and human rights abuses. At Sonnedix, we strive for the highest standard of human rights and treat these allegations with the utmost seriousness. We are taking the following approach to minimise our exposure to forced or child labour and human rights abuses in our supply chain.

### Outward looking:

Driving and achieving systemic change in complex supply chains requires collaborative action with other key industry stakeholders. Since 2021, Sonnedix has sponsored SolarPower Europe and Solar Energy UK's work in developing a solar-industry specific value chain assurance programme.

This collaboration between the solar associations and businesses saw, in October 2022, the launch of the Solar Stewardship Initiative (SSI). Designed to further enhance transparency and responsibility across the entire value chain, the SSI is endorsed by more than 40 solar organisations. In 2024, building on the foundation set by the SSI ESG Standard published in 2023, the new SSI Traceability Standard was introduced and the manufacturer certification programme commenced, marking an important step forward in industry-wide accountability. These types of initiatives, alongside regulatory actions, are key to safeguarding the global solar supply chain from human rights abuses. For further information on the SSI, refer to the SSI [website](#).

## Inward looking:

Throughout 2024, Sonnedix had a number of projects in development and construction. In recent years, we have transitioned from sourcing equipment from numerous individual suppliers to establishing large framework agreements with key suppliers. This has allowed for greater engagement around responsible supply chain practices with our suppliers. Throughout the year, we continued to conduct supplier screening and due diligence, implementing contractual provisions on human rights and forced labour. This includes traceability requirements for key equipment suppliers, subjecting them to supply chain mapping and traceability audits.

In addition to screening by the ESG team, suppliers providing modules undergo third-party quality, ESG and traceability audits. Factory ESG audits cover key risks such as ESG governance, supply chain management, environmental management, health and safety and employee responsibility. Traceability audits focus on the provenance of materials, evaluating suppliers' traceability management systems and processes. Over the course of 2024, 18 supplier quality, ESG and traceability audits were conducted. These measures help us reduce risk exposure and enhance transparency across our supply chain.

The ESG team further assesses potential exposure to human rights risks for every new acquisition for incorporation into investment decision-making. Additionally, the ESG team coordinates internal cross-functional collaboration around this topic and, as appropriate, reports to the Board on the actions that Sonnedix is taking to mitigate human rights risks.

## Effectiveness

Sonnedix will assess any instances of non-compliance as they arise on a case-by-case basis and take action as required. We will only conduct business with those who fully comply with this statement or who are taking demonstrable steps towards compliance.

## Training

All Sonnedix employees are provided with compliance training upon commencing employment which includes whistleblowing, covering how concerns should be raised by our employees should they suspect any wrongdoing or breaches of the law, our Code of Conduct or policies. Furthermore, modern slavery is specifically included in the environment, social and governance training that is mandatory for all new employees.

## Next Steps

Sonnedix will continue to review our internal processes to evaluate what further steps can be taken to improve our position regarding slavery and human-trafficking. We will also continue to implement training and promote improved awareness of slavery and human-trafficking across the business. The percentage of employees who have completed the ESG and ethics and compliance training will continue to be tracked as a key performance indicator along with the number of audits of our key suppliers and grievances received which relate to modern slavery or forced labour.

Furthermore, Sonnedix will continue to collaborate with other key industry stakeholders and actively participate in renewable energy industry associations' initiatives that aim to increase end-to-end transparency and sustainability across solar supply chains. A further update will be given in the 2025 statement.



Sonnedix Power Holdings Limited

Director's Name: Carlos Guinand

Title: Chairman of the Board

Date approved: 26 June 2025