

# Modern Slavery Statement 2018



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 2018 to prevent and eradicate forced labour and human trafficking in Sonnedix’s global operations and supply chains.

## Our Business

Sonnedix is an established Independent Power Producer (IPP) with a proven track record of successfully designing, financing, building and monitoring high-performance, cost-competitive solar plants around the world.

At the close of 2018, the Sonnedix corporate structure included multiple entities in and approximately 151 employees across Chile, the United States of America, Puerto Rico, France, Spain, Italy, South Africa and the United Kingdom. Sonnedix had a controlled capacity of 1,641 MW of which 804 MW were operational/mechanically complete and 837 MW were under construction & documentation.

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 goal of smartly transforming the sun’s power into clean energy. It’s what allows Sonnedix to behave sustainably, ethically and accountably as we develop, finance, build and operate solar plants around the world. It’s also what ensures that Sonnedix have a positive impact on our people and 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 Human Rights, Child and Forced Labour Standard. 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 policies detailed above our commitment is underpinned in the following policies and standards.

- Sonnedix Social Policy,
- 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, competitors and our community. An important aspect of accountability and transparency is a mechanism to enable all individuals to voice concerns internally in a responsible and effective manner when they discover information that they believe shows wrongdoing. Sonnedix therefore provide 24/7 reporting of any concern including those which may relate to slavery and human trafficking.

## Due Diligence

Recognising the supply chain as a key risk area, Sonnedix conducts comprehensive due diligence on its high risk third-party engagements, including on its 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 addition, our contractual documentation includes appropriate compliance terminology and language, and through our Global Partners Standards of Conduct we obtain an undertaking of compliance from those working with us or on our behalf.

## Risk Identification

Sonnedix consider the inherent risk of encountering modern slavery within its business and supply chain to be low; however, should risks or exceptions be identified they are reported to the Risk Committee. To date this has not been necessary.

## 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 and how concerns should be raised by our employees should they suspect any wrongdoing or breaches of the law, our Codes of Conduct or policies. In 2018, this training did not specifically address modern slavery but in 2019 our training program will be expanded to include modern slavery awareness training for all employees across all jurisdictions in which Sonnedix operate.

## 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 develop further training and promote improved awareness of slavery and human-trafficking across the business. The percentage of employees who have completed the modern slavery awareness training will be tracked as a key performance indicator along with the number of grievances received which relate to modern slavery or forced labour.

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Title Director

Sonnedix Power Holdings Limited

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