

Modern Slavery Statement 2023.

I. Introduction

Human trafficking and modern slavery are grave forms of human rights abuse. ThomasLloyd Group LTD (the “Company”) and its subsidiaries (together the “Group”) are committed to the prevention of human trafficking and modern slavery throughout their operations, business and supply chains.

This statement has been prepared by the Company in line with the Group’s commitment to human rights and social impact, and to comply voluntarily with the UK Modern Slavery Act 2015. It details the actions taken by the Company and the Group to identify and help address the risks posed by our operations, business and supply chains in relation to slavery, human trafficking, child labour or any other abuse of human rights.

II. Our business, organizational structure and supply chains

ThomasLloyd is a climate solutions focused company, offering a range of solutions spanning multiple asset classes supporting the low carbon energy transition. Its focus is on climate infrastructure, particularly renewable energy in emerging and fast-growing Asian economies, including India, the Philippines and Vietnam. We monitor and report on both environmental, social and governance risks associated with this business model, as well as their positive impact. Headquartered in Zurich, Switzerland, the Group operates globally with offices in Europe, Asia and North America.

The Company and its subsidiaries as at 31 December 2023 are laid out below:



This statement applies to the Company and its subsidiaries and extends to the services it provides to third parties or companies outside the Group structure.

III. Our Policies

ThomasLloyd strives to create a positive impact in the communities in which it invests and is fundamentally committed to respecting the human rights of the people it engages with through its business. We do not tolerate any form of modern slavery, forced servitude or indentured, bonded, involuntary prison, compulsory labour or human trafficking in our business operations. Our approach is informed by the United Nations Principles on Business and Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the UN Principles for Responsible Investment (to which we have been a signatory since 2016). Key policies include:

- **The Group Code of Business Principles and Ethics**, which applies to all of the ThomasLloyd team, aims to foster respect for human rights, appropriate behaviours and alignment of values across the team and encourages any colleague who suspects modern slavery to be taking place to speak up and raise that concern.
- **Our Supplier Code of Conduct**, which emphasizes our commitment to Human Rights and our expectation that our suppliers prohibit human trafficking, child and forced labour, and extends our commitment to fair and honest dealings to all others with whom the supplier does business, including employees, sub-contractors and other third parties.

- **Our Sustainability Policy** and associated implementation systems, which recognizes that many countries in emerging and fast-growing Asia, the target markets in which we invest, may have higher risks related to governance and respect for human rights than in developed markets such as the UK or Europe. We consider human rights and modern slavery risks at a country level when developing our investment and management strategy, and then for any individual transaction. Our ESG due diligence frameworks align with the International Finance Corporation’s Performance Standards, and expressly address human rights, child labour, forced labour, and land acquisition related social issues. These issues are monitored on an ongoing basis.

ThomasLloyd Group

A detailed review of active suppliers, and their likely adherence with efforts to avoid modern slavery, was completed in mid-2022. On this basis, the Group has assessed the risk of involvement in human trafficking and modern slavery through its direct operations to be relatively low.

Following this review, an enhanced due diligence process is being rolled out on new suppliers, to check whether they have adopted a position or policy related to modern slavery and human rights, regardless of supplier size or status. Implementation will be expanded through the Group’s revised procurement policies and processes. Our Code of Business Principles and Ethics references the imperative to respect human rights and be take action on modern slavery. The Group aims to encourage openness and will support anyone who raises genuine concerns in good faith to avoid human trafficking and modern slavery, including through the Group’s Speak Up and Whistleblowing procedure.

Approach

We are an impact focused company. In 2023, we concluded a project to revisit, re-energise and refresh our sustainability policy and ESG processes.

Screening	Due diligence	Acquisition and ownership	Management	Exit
<ul style="list-style-type: none"> • Alignment with impact KPIs and values • Risk / Opportunity impact assessment • Exclusions 	<ul style="list-style-type: none"> • Assessment of adherence to minimum standards and ESG policies • Sector tailored materiality assessment and impact scoring using TLG proprietary tools • Road map to address gaps 	<ul style="list-style-type: none"> • ESG and impact conditions to be included in acquisition or greenfield development related initiatives as appropriate • ESG, impact and value creation plans for approval 	<ul style="list-style-type: none"> • At least quarterly asset level reporting on ESG KPIs and PAIs • Guidance and training for counterparts on sustainability and impact 	<ul style="list-style-type: none"> • Reporting on ESG and impact achievements including scoring • Vendor due diligence

IV. Training

We conducted a range of trainings on our Sustainability Policy and ESG issues including its provisions related to human rights and good governance. We seek to raise awareness of risks related to human trafficking and modern slavery, warning signals, and to clarify how to raise concerns within the Group.

V. Our 2023 effectiveness

In 2023, we have not identified any modern slavery concerns. Additionally, we have not identified any issues which led to a contract exit process due to modern slavery concerns. We engaged with key counterparts to strengthen their human rights policies, and attention to modern slavery issues, including in their own procurement processes. Since the launch of the whistleblowing reporting service in December 2021, and throughout 2022 and 2023, we have had no whistleblowing incidents involving modern slavery issues or concerns. In 2023 we initiated a review of our procurement and supplier engagement policies and processes, including to ensure appropriate attention to material environmental, social and governance related risks, including modern slavery. These policies will be rolled out in 2024, with automation, outreach and training for all staff and existing contractors envisaged.

If we discover any malpractice, we have a range of approaches ready to invoke with the supplier involved. Depending on the infringement severity, this could include education or assistance for the supplier, monitoring of remediation being achieved,

contract suspension (while remediation is sought or gaps closed and such action is evidenced), or potentially immediate contract termination.

VI. Our ongoing commitment and focus into 2024

We recognize that these risks require constant commitment and vigilance. In 2024 our priorities include aiming to:

- Roll out an enhanced set of procurement and supplier engagement policies, including specific provisions related to modern slavery, and automating their implementation;
- Continuing to engage key counterparts to strengthen implementation of their policies related to modern slavery and human rights, including for their suppliers;
- Increase transparency in our operations and supply chain, and responding effectively to new risks as they are identified.

We will assess the effectiveness of these measures periodically.

This Statement has been considered by the Group Sustainability Committee and was approved by the Board of the ThomasLloyd Group LTD on 29 March 2024.

Michael Sieg
CEO

ThomasLloyd Group LTD