



Red Rock Power Limited Statement on Modern Slavery and Human Trafficking

Last updated: June 2023

Introduction from Senior Management

It continues to be a priority for Red Rock Power Limited to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we have undertaken during financial year ending 2022 to combat modern slavery in our organisation and supply chain.

Organisation's Structure and Business

We are an Edinburgh based investor, developer and owner-operator in the renewable energy sector. Red Rock Power Limited is a European subsidiary of SDIC Power Holdings Co., Ltd, a global power company based in Beijing. SDIC Power Holdings Co., Ltd, is a company listed on the London and

Shanghai Stock Exchanges, with State Development and Investment Corporation holding a majority stake.

Our Supply Chains

During the 2022 financial year, we worked with approximately 200 suppliers. Our main 2022 supplier spend related to:

- the procurement of engineering services and balance of plant works;
- the supply, installation and servicing of wind turbines by third party contractors;
 - outsourced service partners for operational assets (maintenance service agreements, site management etc.); and
- the procurement of advisory, legal and financial consultancy services.
- 100% of our 2022 direct supplier spend was with suppliers based in countries that are considered to have a low prevalence of slavery according to the Global Slavery Index.

Our Policies on Slavery and Human Trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies.

Our policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and

human trafficking is not taking place anywhere in our supply chains. We have the following policies in place relevant to modern slavery, which we continuously review and update:

- Ethics Code of Conduct for Suppliers
- Procurement policy
- Whistleblowing policy
- Grievance policy

This includes our *[RRPL Procurement Booklet v2 \(redrockpower.co.uk\)](https://www.redrockpower.co.uk)* which details our approach to supporting supply chain growth and our procurement priorities.

Due diligence processes for slavery and human trafficking

We understand that the following commodities give rise to the highest modern slavery risks: turbine supply, electronics, construction materials/workforce, installation vessels and PPE.

As part of our due diligence, we have undergone a process to identify and mitigate risk within our supply chains by mapping our key commodities and assessing threats associated with modern slavery and scope to influence through our procurement processes. We use publicly available third-party data to determine the level of risk associated with each country and category of goods. This assessment enables us to identify potentially high-risk suppliers to prioritise future supplier engagement and investigation if necessary.

Our proactive contract management strategy focuses on contract assurance, as well as keeping sustainability as a standing item on the agenda - not only in relation to ethical, sustainable sourcing but also sustainable processes and relationships that support our company's mission to build a better future with a particular focus on understanding the wider supply chain and any issues within it, including pertaining to modern slavery.

Our Qualification Questionnaire requires suppliers to confirm their commitment to supply chain management within their organisation, providing details around formal mechanisms to select approved subcontractors. We ask suppliers to provide information on their quality, environmental and health & safety management systems including details of any certifications. The Qualification Questionnaire requires input from suppliers on their corporate social responsibility, including a self-declaration that they have not been found guilty of any forced labour, bribery and/or corruption. Following our initial review, we determine if the supplier has passed or failed and if further investigation is required.

We ensure the inclusion of robust anti-slavery and human trafficking clauses in business-to-business supply of goods and services contracts, where we consider that the risk of modern slavery and human trafficking in the supply chain is medium to high due to factors such as industry, location or due diligence replies.

Supplier Adherence to Our Values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme.

For example, Factory Acceptance Tests will be undertaken for turbine and component part production which could include a review of working conditions.

We have a dedicated sustainability working group which addresses modern slavery related risk within our supply chains. This includes representatives from the following departments:

- HSEQ
- Procurement

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

Our workforce

We ensure that right to work is evidenced for all direct workers and relevant verification and vetting checks are carried out. Further checks are then performed, and all new candidates provide 3 years of

employment history.

The Real Living Wage is an hourly rate of pay set independently by the Living Wage Foundation. It is separate from the Government's National Living Wage and Minimum Wage. We have voluntarily adopted the Real Living Wage.

Our direct operations and employees are based in countries that are considered to have a low prevalence of slavery according to the Global Survey Index.

Our Effectiveness in Combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Number of people in Procurement team that have completed CIPS (Chartered Institute of Procurement and Supply) Ethical Procurement and Supply training on an annual basis;
- Applicable procurement led engagements that have a completed risk assessment; and
- Number of modern slavery cases reported.

Furthermore, a new contract management system is being implemented throughout 23/24 which will allow for recording and monitoring of KPIs, including, with reference to slavery and human

trafficking in the supply chain for suppliers, an obligation to publish their approach to tackling modern slavery under the current legislation.

Further steps

We recognise that the eradication of modern slavery and human trafficking is a continuing, collaborative and evolving process.

Our priorities for the year ahead are:

- Enhancing our supplier due diligence processes around modern slavery risks;
- Continuing to engage with our suppliers to promote responsible business practices;
- For high commodity risk suppliers, looking at what additional measures can be introduced as part of our due diligence and to strengthen our contractual language for such suppliers;
- ISO certification 20400 for sustainable procurement;
- Implementation of supplier management software to allow us to track, report and manage supplier compliance; and
- Continuing to strengthen employee awareness of modern slavery and forced labour.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022. It was approved by the board on 17 May 2023.