



Human rights policy

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Respecting Human Rights

In Lightsource bp, we are committed to conduct our business in a manner that respects the rights and dignity of all people, complying with all legal requirements. This policy scope covers our own employees, our counterparties, and communities affected by our business activities.

We recognise our responsibility as stated in the United Nations Guiding Principles (UNGPs) on Business and Human Rights and reiterated in the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. We respect internationally recognised human rights as set out in the International Bill of Human Rights (IBHR) and core labour standards recognised by the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, and in alignment with Sustainable Development Goal (SDG) 8, Decent Work.

We are committed to complying with local laws in every country we operate in. Consistent with UNGPs, if there is a conflict between international standards and local laws, Lightsource bp will comply with the highest standard.

- We support the effective abolition of child labour, and all forms of forced or compulsory labour.
- We respect the freedom of association and the right to collective bargaining and the payment of fair wages enabling employees to meet their basic needs.
- We respect the right to a safe and healthy workplace, and ensure housing provided to employees is safe for habitation with access to clean water.
- We respect the right to freedom of movement within each country.
- We treat everyone who works for Lightsource bp fairly and without discrimination on any ground (including race, nationality, religion, age, gender, sexual orientation, gender identity, or disability). Our employees, contractors and suppliers are entitled to work in an environment and under conditions that respect their rights and dignity.
- We respect the human rights of people in communities that may be affected by our activities, including indigenous people, minorities, and other vulnerable groups.
- We commit to not retaliate against human rights, environmental or indigenous defenders lawfully exercising their right to freedom of expression, association, peaceful protest, or assembly.
- We seek to make contractual agreements with our contractors and suppliers that require they and their contractors and suppliers respect internationally recognised human rights in their work for Lightsource bp.

How we're going to do it

Take a risk-based approach. We seek to identify and prevent actual or potential adverse human rights impacts through our business activities. We conduct, on a risk basis, human rights impact assessments of our business activities and supply chain. These assessments inform our improvement plan, and we monitor delivery of this plan.

Embed in our people processes. Respect for our employees' human rights is integral to our Code of Business Conduct and Ethics and is embedded in our recruitment and people management ways of working. To support the implementation of this policy, our Code of Conduct, and our Health Safety Security and Environment (HSSE) policy, we conduct periodic training and communication to relevant employee groups, in line with their roles and responsibilities.

Communicate our expectations to counterparties and conduct appropriate due diligence. Our Code of Business Conduct and Ethics for Counterparties reinforces and supports our commitment to respect human rights. Human

rights requirements are included in our criteria for supplier selection and supplier management for high-risk categories. Our contract language further supports the commitment to human rights.

We understand that our counterparties can have direct adverse impacts on human rights. For this reason, we want to work with those that share our commitments to human rights, safety, and ethics and compliance. We seek to use our leverage to encourage them to act in a manner consistent with the commitments in this policy.

Engage communities. We seek to identify potential adverse human rights impacts and take appropriate steps to avoid and minimise them through our social planning process. This includes engagement with local stakeholders and managing the process of receiving and responding to community concerns.

Provide a grievance mechanism to our workforce and local communities. Our Speak Up Programme is available to employees, workers employed by our contractors or suppliers and to other third parties, including communities. Our grievance mechanisms include recording and reporting of grievances raised, including in relation to human rights, and actions taken to address them. Lightsource bp has a zero-tolerance policy in respect to retaliation for concerns raised in good faith.

If Lightsource bp identifies that we have caused or contributed to adverse impacts on the human rights of others, we will provide for or co-operate in the remediation of the adverse impacts through legitimate processes intended to deliver effective remedy while not preventing access to other forms of remedy if justified. If adverse impacts are directly linked to our activities through our business relationships, we will support our counterparties in the remediation of those impacts through their own grievance management processes, or support collaboration to provide for non-judicial remediation through third parties.

Promote the protection of human rights through external engagement. We promote this policy in our sphere of influence, including with industry bodies, partners, contractors, suppliers, and customers. We will make sure our communication with governments, regulatory bodies, and public authorities is consistent with our commitments.

Provide oversight and governance. The responsibility and accountability for the management of human rights issues extends across Lightsource bp. The board provides oversight of key risks, inclusive of modern slavery risk. The executive management team reviews progress on our sustainability strategy. The people pillar steering committee oversees the Human Rights policy and implementation of human rights due diligence.

We report annually to stakeholders on the implementation of this policy in our modern slavery and human trafficking statement and our sustainability report.