
Code of Business Conduct & Ethics

Expectations & Commitments

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INTRODUCTION

A MESSAGE FROM OUR CEO

Dear Colleagues,

Welcome to our code of conduct. It stands as the foundation of everything that we do in our roles at Lightsource bp – from me and the Executive team, to our office- and field-based team members.

Our code sets clear expectations and standards for doing the right thing. It protects each of us and Lightsource bp, all in support of our ambition to become a global leader in onshore renewables and a key enabler of the energy transition.

Our code embodies our values and guides how we work together. It's there to support us whenever we face uncertain choices at work. While doing the right thing isn't always straightforward, it's essential. Ethical decisions come in many forms – choosing the right partners, speaking up about risky or harmful activities, or simply saying no to things we believe to be wrong.

In an ever-changing world, we frequently face new challenges – and the code may not address every situation you encounter. If you are ever in any doubt, please 'Speak Up'. Our 'Speak Up' channels are here for you. Choose the one you are most comfortable with, whether it's a manager, supporting advisor like Ethics & Compliance, or our Code Helpdesk. The important thing is that you say something. And remember – Lightsource bp does not tolerate retaliation of any kind. We will always listen; it's how we keep improving.

Finally, our code is only effective if we read it, if we understand it, and if we apply it with good judgement in everything that we do at Lightsource bp. Find a way to make the code personal to you – ask yourself how you will improve Safety, treat people with Respect, lead with Integrity and bring our Sustainability objectives to life.

Every member of our leadership team holds themselves accountable to the standards set out in our code – we know and expect that you will too.

Thank you,



Joaquin Oliveira,
Group CEO

OUR CORE VALUES

Our purpose

We are united in delivering solar power for our world.

We are our core values

Safety

Safety is integral to everything we do. We take full responsibility for creating and maintaining a safe and healthy environment for our people and our world.

Integrity

We are a company of uncompromising integrity and business ethics. We achieve our ambitions and strategic initiatives by doing the right thing in an honest, fair, and responsible way, with and by our employees and business partners, every time.

Respect

We respect the law, support universal human rights, protect people and the environment and benefit the communities where we work. We respect each employee's individuality and privacy, and do not tolerate discrimination. We take great care to respect the people, and cultures and environments of the communities we work with, world-wide.

Sustainability

As a renewable energy company, we are part of the climate change solution. We have set out a sustainability framework, underpinned by our Core Values to ensure we remain climate conscious and continuously improve.

Drive

We are the solar brand our communities and customers have come to count on. We adopt a solutions-driven mindset throughout our entire business, in order to stay ahead of the game in an ever-changing global energy landscape.



The purpose of our Code

This Lightsource bp (“Lightsource bp” or “Company”) Code of Business Conduct and Ethics (our “Code”) represents a collective commitment by Lightsource bp employees to do what is right. It offers guidance to assist in making safe and ethical decisions and provides awareness of the applicable laws and regulations we operate within when acting on behalf of the Company. The Code sets out obligations that go further than merely complying with the laws that apply to our business, and also outlines the Company’s expectations on how we do what we do to ensure alignment with our Core Values.

Each Lightsource bp employee and business partner has the responsibility to adhere to these standards, and to apply them in good faith and with reasonable business judgment. There may be times when local laws, regulations or customs conflict with our Code. Whenever there is a conflict or a difference between an applicable legal requirement and our Code, you must always apply the strictest standard.

All Lightsource bp employees should observe the highest of standards of business and personal ethics and safety when performing assigned duties on behalf of the Company. This requires using honesty, integrity and judgement when dealing with other company employees, the public, the business community, shareholders, customers, contractors and governmental and regulatory authorities.



Who does the Code apply to?

Our Code applies to all Lightsource bp employees (regardless of employment status), officers, and members of the Board.

The behaviour of our business partners can also have a direct impact on our reputation when representing and working with or for our Company. Therefore, we will take appropriate measures to ensure our chosen business partners (including but not limited to operated joint ventures, suppliers, agents, contractors, customers, and other third parties) are aligned with our Code and its underlying commitment to safety, ethics and compliance.

Our responsibilities

Lightsource bp employees are expected to read and be familiar with the information in our Code. You will be asked to certify annually that you have and will continue to act in accordance with our Code.

The individual certification represents your confirmation that you have acted in a manner that is safe, ethical, and consistent with applicable laws and regulations, Lightsource bp strategic vision, policies and procedures, Lightsource bp Core Values and this Code.

In addition to the above, those in leadership and/or managerial roles are expected to lead by example and represent a positive role model for us all.

This must be done by creating an environment that is respectful and inclusive, encouraging team members to Speak Up, listening and responding to concerns when they are raised, and doing your part to make sure that no one experiences retaliation for speaking up or cooperating in an investigation.

Your consistency in enforcing our Code, respective policies and procedures, and holding your teams accountable for their behaviour at work is important to building and enforcing the culture of continuous improvement we strive for.

The Company’s Board of Directors have overall responsibility for ensuring this Code complies with our legal and ethical obligations, and that all those under their control comply with it.



Our Speak Up program

Understanding and adhering to our Code is the responsibility of all Lightsource bp employees. You are required to avoid any activity that might lead to, or suggest, a breach of our Code or its underlying policies.

Part of building a culture of trust is learning to speak up when something’s not right, so that we can address the problem. Each of us has a responsibility to speak up if we see something unsafe, unethical or potentially harmful. If you have a question, need help or want to raise a concern you have several options on how to Speak Up:



Your manager



A member of your Leadership Team



A Legal, HR, E&C or HSE colleague



Ethics inbox:
ethics@lightsourcebp.com



Code Helpdesk
a confidential, independent reporting tool

Zero tolerance on retaliation

All issues raised in our Speak Up Program (regardless of which avenue they are reported through) are taken seriously. Where practicable, the Company will act in a confidential manner to appropriately investigate the specifics of the concern raised (which, when appropriate, may involve the use of external parties).

The Company will not tolerate issues raised in bad faith, nor retaliation for concerns reported in good faith, which we believe are in violation of our Code or any Company policy.

Changes to the Code

Our Code will be reviewed annually. The most recent version can be found at:

<https://www.lightsourcebp.com/sustainability/people/>

Use this QR Code to reach Lightsource bp’s Code Helpdesk.





OUR PEOPLE

Whatever the strength of an individual, we will always accomplish more together.

We put the collective good ahead of personal success and commit to achieving our goals and ambitions together. We trust each other to deliver on our respective obligations.

We are committed to creating a workplace that is characterised by respect for people’s rights, contributions, responsibility, excellence and mutual trust.

We all have a role in maintaining a culture based on integrity, equality and fairness.

Additional resources on the Lightsource bp Intranet:

- Lightsource bp Speak Up Policy and Procedure
- Lightsource bp Employee Handbook
- Lightsource bp Equal Opportunity Policy
- Lightsource bp Privacy Policy





Diversity, inclusion and equal opportunity

We value diversity of people and thought, and we value every employee for their unique contribution to the Company. We aim to make sure that everyone at the Company – and everyone we work with – is treated with fairness, respect and dignity, and never discriminated against.

The sense of fairness and equal opportunity is important to us. Work-related decisions will always be based on merit, not on race, nationality, religion, gender, age, sexual orientation, gender identity, marital status, disability or any other aspect which makes them unique, including those protected by applicable laws. We will collectively continue to build a workforce that is representative of the communities that we serve.

Creating and maintaining a respectful workplace

Respect is a Core Value for the Company. As Lightsource bp continues to grow, we will welcome employees and business partners who represent countries, cultures, and lifestyles from across the globe. Lightsource bp respects the human rights of all employees and business partners and will not tolerate any form of abuse or harassment of employees, contractors, suppliers, customers or anyone else we work with. This includes actions that can reasonably be considered offensive, intimidating or discriminatory, as well as any form of sexual harassment.

Protecting personal data

Lightsource bp is committed to providing a positive work environment and expect that all Lightsource bp employees will represent our company with integrity and professionalism, and will respect the confidentiality of all aspects of our business operations, including personal information. We are committed to respecting people’s privacy by processing personal data fairly and lawfully, and ensuring that the confidentiality, integrity and availability of information is protected. We may also take an interest in any activities of our employees outside of the workplace, if they threaten the Company’s reputation or we have a legitimate business interest to do so.

We process data in accordance with national data protection laws. For further information on how your data is processed or to exercise your rights under data protection law, view our Lightsource bp Privacy Policy or contact our Data Protection Officer at privacy@lightsourcebp.com directly.





OPERATING SAFELY & RESPONSIBLY

Safety is a Core Value and top priority of the Company. Lightsource bp prioritises the safety of every employee, business partner, and member of all communities we work with across the globe. We are committed to protecting the environment and respecting the rights and dignity of communities around the world where we do business.

We are committed to excellence and to the disciplined management of our operations. Our health, safety, security and environment (HSSE) goals are to ensure no accidents, no harm to people and no damage to the environment occur.

Protecting health, safety, security and our environment

Creating and maintaining a long-term and continuous safe and healthy environment is our top priority, from our people, business partners and delivery of our business, to creating sustainable solutions that are safe by design.

Lightsource bp employees, contractors and business partners are expected to behave responsibly and embrace our shared goals for health, safety, security and the environment.

To achieve this, we must be vigilant and disciplined, and must always look out for one another. Each of us is not only responsible for our own health and safety but for those around us.

We must act proactively and instinctively lead by example:

- Do not undertake work that you are not qualified to perform
- Risk assess all work tasks and ensure they are suitably and sufficiently controlled to mitigate risk to ALARP (As Low As Reasonably Practicable).
- Stop work, your own or others', if you consider it unsafe.
- Play your part in protecting the environment – make it a personal priority.
- Be sure that your performance is not impaired, for example by a lack of sleep, alcohol, or any drugs – including prescription or over the counter medication.
- Speak up if you observe an unsafe or unhealthy working environment. Listen to others who speak up.
- Expect and encourage contractors and others with whom we work to comply with applicable HSSE requirements.

- Report any accident, injury, illness, or unsafe condition immediately. Never assume that someone else has reported or will report a risk or concern.
- Know the emergency procedures that apply where you work.

Remember your golden rules for HSSE

- Safety intention is accident prevention.
- Protect the environment to ensure a sustainable future for generations to come.
- If you see it, you own it. Never look the other way.

Contact our HSE Team, or use resources provided under the Speak Up Program, if you have concerns or see acts against the Company's expectations for protecting the health, safety, security and environment for all involved.

Additional Resources on the Lightsource bp Intranet:

- Lightsource bp Speak Up Policy and Procedure
- Lightsource bp Employee Handbook
- Lightsource bp Health, Safety, and Environment Policies and Procedures and respective online training



OUR ASSETS & FINANCIAL INTEGRITY

Lightsource bp has a business responsibility to protect Company property, intellectual property and financial assets. We comply with all the applicable laws and regulations in the way we record, retain and report information.

Accurate reporting & accounting compliance

We record and report company information honestly, accurately and objectively. This includes financial and non-financial information. Any information we create will accurately reflect transactions and events.

Our stakeholders, including business partners, government officials and the public, rely on our accurate and complete disclosures and business records.

Such information is also essential within Lightsource bp so that we can make robust and well-considered decisions.

As a Lightsource bp employee, this means you must always:

- Ensure all transactions are properly authorised, recorded and reported, as required.
- Follow applicable laws and Lightsource bp policies and procedures when creating, maintaining, retaining or destroying documents including those in electronic formats.
- Make sure you have the necessary approvals when you respond to a request for information from a government, regulatory agency or a representative from the media.

It is a violation of Company policy to fail to keep accurate and complete records, falsify information, or create misleading information. It could constitute fraud or an infringement of human rights, which could mean civil and criminal liability for individual employees and the Company.

If you are ever concerned about the validity of any information, data or financial process or think you might have been asked to create false or misleading information, you need to raise your concern immediately with our Chief Financial Officer (CFO) or other subject matter expert in Finance. If you ever feel the need to talk to someone in confidence and/or anonymously, use the Speak Up resources provided (see page 5 of this Code).

Use, protection & security of company assets

All Lightsource bp employees are responsible for making sure our assets are not misused or wasted. Our assets include property, proprietary information, company funds, company equipment, and all/any other company resources. As a Lightsource bp employee, this means you must always:

- Be conscientious and act appropriately to ensure Company assets are not damaged, misused, or lost.
- Make sure your user IDs and passwords are secure.
- Ensure computer equipment, phones, email and internet access are used for business purposes only and monitored regularly to help the Company defend against cyber-attacks and malicious activity.
- Protect Company information.
- When handling confidential and secret information, be especially careful by encrypting it when required and sharing it only with authorised parties.
- Do not share Company information in public forums or on social media.
- Be vigilant against cyber-attacks and scams such as phishing and report immediately any incidents, including potential or actual losses of Company information or assets.
- Guard our intellectual property and respect the intellectual property rights of others.



Intellectual property & other protected information

From ideas and inventions to trademarks, our intellectual property is valuable to us. Various laws enable us to protect it from abuse by people outside the company.

Intellectual property includes:

- Patented inventions
- Designs
- Copyright materials
- Trademarks and service marks
- Trade secrets and know-how

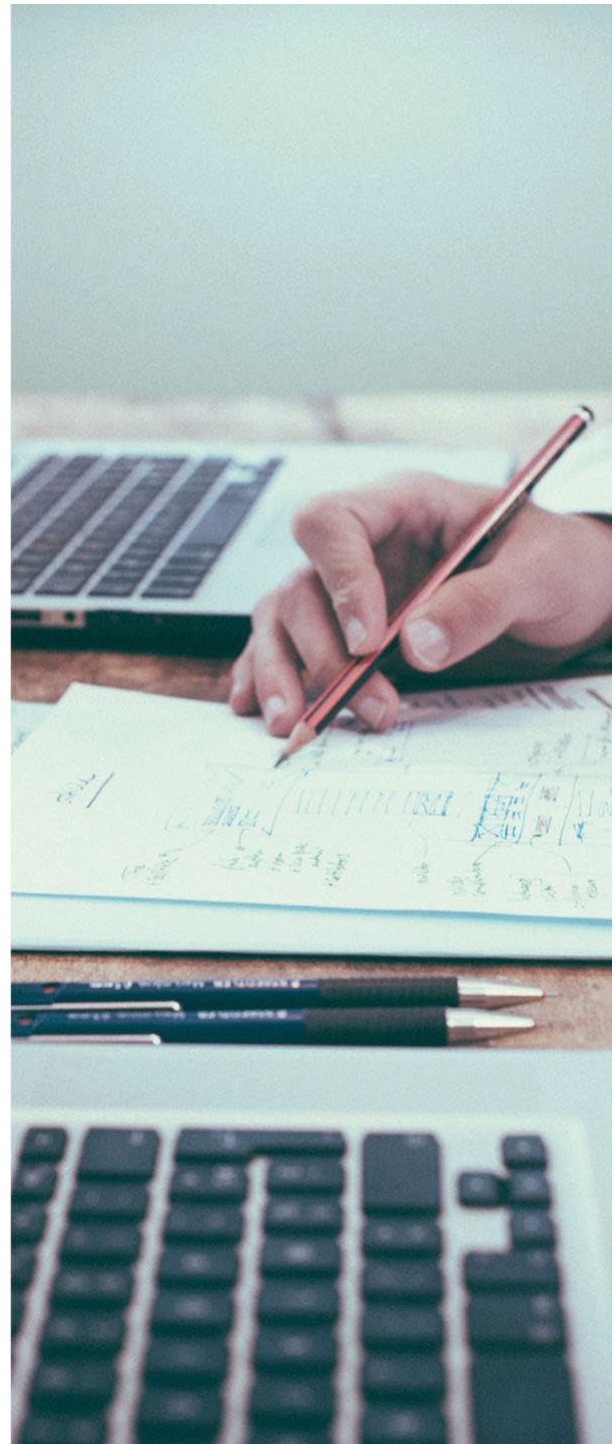
Other confidential business information that also represents valuable intellectual property of our Company includes:

- Sales, marketing, customer and other corporate databases
- Marketing strategies and plans
- Research and technical data
- Business ideas, processes, proposals or strategies
- New product and/or package design and development
- Software bought or developed by the company
- Information used in trading activities including pricing, marketing and customer strategies

Insider dealing

As an Lightsource bp employee, you may become aware of information about bp p.l.c. and other companies that is not publicly available and which would be considered relevant to an investor when deciding whether to invest in that company (known as ‘inside information’).

Trading shares of bp p.l.c. or any other company when you have inside information or sharing it with others is prohibited, may be illegal and could result in severe criminal penalties.





OUR BUSINESS PARTNERS & OTHER COUNTERPARTIES

Everyone benefits from business relationships based on trust and honest discussion. They are vital to our success. To make sure our business relationships work to everyone’s advantage, we need to understand the needs of our business partners and other counterparties we work with, to ensure interactions are handled honestly, respectfully and responsibly.

This includes, but is not limited to, our customers, contractors, suppliers, joint venture partners and agents. While we need to be competitive, everything we do must always be both legal and fair.

We are a responsible company committed to meeting our obligations and building long-lasting relationships.

Working appropriately with business partners & counterparties

Our business partners (and other counterparties, including government officials, consultants, service providers, land agents, etc) are important to us, underpinning our ability to do business and meet our customers’ expectations.

Lightsource bp has risk management processes and procedures in place to ensure our business partners and counterparties are screened and selected carefully, using a transparent process based on objective criteria and evidence.

Fundamental to our relationships with business partners and counterparties is that they operate according to principles that are equivalent to those in this Code.

Lightsource bp may require business partners and counterparties to make a contractual commitment to follow the principles of our Code, as well as our ethics and compliance requirements.

It is important that we always:

- Communicate clearly our expectations to business partners and counterparties, agreeing contractual obligations where applicable, and take the appropriate measures if they do not meet those expectations or obligations.
- Report any indications that business partner or counterparty is not complying with applicable laws or their contractual obligations.
- Know and follow the applicable Lightsource bp policies and procedures. This includes government contract requirements and joint venture requirements
- Seek guidance from our Legal or Compliance team if ever in any doubt.

To help keep our standards high and our supply chain strong, always tell our Compliance or Legal team if any business partner or counterparty fails to respect our Code.





Complying with anti-bribery and anti-corruption laws

Lightsource bp employees and business partners must comply with anti-bribery and anti-corruption laws everywhere we do business. Even just a perceived breach of anti-bribery or anti-corruption laws can damage our reputation.

Lightsource bp:

- Prohibits offering or providing payments, services, gifts, entertainment or ‘anything of value’ to government officials and private individuals to improperly influence them, to obtain or retain business, or to gain a business advantage
- Forbids making improper payments through third parties
- Requires companies to keep accurate books and records, and maintain adequate internal controls, so that payments are honestly described, and company funds are not used for unlawful purposes
- May have committed an offence if it fails to prevent bribery by someone acting on its behalf
- Does not engage in bribery or corruption in any form, whether in the private or public sector. This means:
- Lightsource bp employees must never offer, promise, give, receive or solicit anything of value to influence how someone carries out a public, commercial or legal duty – including ‘facilitation’ payments. ‘Anything of value’ includes any type of benefit to the recipient. This includes cash, loans, gifts, jobs, tuition, scholarships, contracts, entertainment, travel and contributions.

It also covers intangible benefits – for example, hiring someone’s relative as a favour to the recipient or donating to their favourite charity.

Additionally:

- All business partners and counterparties who represent or act on behalf of the Company must be asked to comply with applicable bribery and corruption laws. Where appropriate, they must show that they have appropriate programmes to prevent bribery in place. ‘Someone acting on Lightsource bp’s behalf’ includes but is not limited to employees, developers, co-developers, EPCs, contractors, landowners, joint ventures, consultants, suppliers or subsidiaries.
- Lightsource bp prohibits ‘facilitation’ or ‘grease’ payments to government officials by anyone who works for the Company or anyone acting for us. This applies no matter how small the amounts are. ‘Government Officials’ include any minister, elected or appointed official, director, officer, civil servant or employee of any government (whether at a national,

state/provincial or local level) or any department, agency or instrument of it, and/or of any enterprise in which a government owns an interest, and/or of any public international organisation.

This term also includes any person acting in any official, administrative, legislative or judicial capacity for or on behalf of any such government or department, agency, instrument of it, company, or public international organisation.

Also included are political party officials and candidates for public office. For example, any officer or employee of a national energy company is deemed to be a government official, as are members of customs, military or police organisations.

‘Facilitation payments’ are payments made to a government official to secure or speed up routine, non-discretionary, legal government actions, such as issuing permits or releasing goods held in customs.

Once again, no form of bribery or corruption is permitted, regardless of sector (commercial, private, or public) or whether the recipient is a government official or a private business person.

Breaching anti-bribery and anti-corruption laws is a serious offence and a violation of your employment obligations. Companies and individuals breaching these laws risk significant reputational and financial harm and may face imprisonment.

Most countries have laws prohibiting bribery and corruption. These often cover actions carried out beyond the country’s borders – such as bribes paid to someone in another country.





Complying with competition & antitrust laws

All Lightsource bp employees must comply with competition laws, known in the US and some other countries as antitrust laws. These are laws that protect Lightsource bp by prohibiting anti-competitive behaviour.

This behaviour may include:

- Entering into anti-competitive agreements with competitors, including price fixing, bid rigging, market allocation and agreements to restrict supply
- Exchanging competitively sensitive information with competitors, including with potential or actual joint venture partnerships
- Imposing restrictions on customers or suppliers
- Abusing a position of market dominance
- Entering into certain mergers and acquisitions

Even discussing the possibility of carrying out the above listed behaviour, whether or not the intention is to actually carry out the behaviour, is prohibited under competition law.

Even where some behaviours may be lawful (for example, in a country that has not adopted competition laws), we will not, and our employees must not, enter into any arrangements with competitors that could harm Lightsource bp’s reputation.

Most countries in which we do business have competition laws. Some of these apply beyond national boundaries – for example, the rules in the European Union and the US.

The penalties for breaking competition laws are severe. Fines for anti-competitive behaviour can be up to 10% of the Company’s annual global turnover. As well as being fined personally, individuals convicted of the most serious offences can face imprisonment.

Complying with human rights laws

We know that our business partners (including non-operated JVs contractors and suppliers) can, through the conduct of their activities, have direct adverse impacts on human rights.

For this reason, we want to work with business partners that share our commitments to human rights, safety, ethics and compliance and we seek to use our leverage, consistent with the United Nations Guiding Principles, to encourage them to act in a manner consistent with the principles underlying the commitments set out in this policy, which include:

- Compliance with all applicable laws and respect for internationally recognised human rights, wherever we operate.
- Seeking ways to honour the principles of internationally recognised human rights when faced with conflicting requirements
- Treating the risk of causing or contributing to gross human rights abuses as a legal compliance issue wherever we operate.
- Avoiding causing or contributing to adverse human rights impacts through our business operations and addressing such impacts when they occur.
- Seeking to prevent or mitigate adverse human rights impacts that are directly linked to the services provided by our business partners and other counterparties.

If you believe there are actual or potential human rights abuses in our operations or in those of our suppliers or other business partners, Speak Up and raise your concerns.





Complying with trade restrictions, export controls & anti-boycott laws

Lightsource bp is a UK-based company with business operations across the globe.

We always comply with the applicable laws governing trade restrictions of the countries in which we operate, unless those laws conflict with the laws of the US, the UK or the EU.

In the event of a conflict, or if you are not sure whether there is a conflict, consult with our Legal or Compliance team.

From time to time, some countries impose trade restrictions covering specified countries, entities and individuals. These may include the US, the UK and the EU. They also periodically impose controls on the export and the end use of certain products, technology, software and services.

The consequences for breaking these laws, which sometimes apply outside the legislating country, can be very serious.

In addition to significant reputational harm, penalties include fines, debarment from working on government contracts, revocation of permits to export, and imprisonment.

Trade restrictions typically cover:

- Exports or re-exports to a prohibited or sanctioned country, entity or individual, without the appropriate license or authorisation.
- Imports or property dealings from, or originating in, a sanctioned country.
- Imports or property dealings with a sanctioned entity or individual.
- Business dealings with a sanctioned country, entity or individual.
- The transfer of restricted software, technical data or technology without a licence, by email, download or disclosure to people in or from sanctioned countries
- The provision of defence-related services or export of articles or services designed or adapted for military or other restricted end use, without a licence or authorisation
- The prohibition of certain business activities, for example, US anti-boycott laws
- Product classifications, export controls and lists of restricted individuals, entities and countries, which are complicated and change regularly.

If we are involved in the sale or shipment of products, technologies or services across country borders, make sure you know the relevant rules, and check with our Legal or Compliance team for any updates or advice you might need.

Breaching trade restrictions and export controls can have serious financial and reputational consequences.

If you have any questions about these laws, contact our Legal or Compliance team.

Gifts, business meals & hospitality

We only give or accept gifts and business meals, or provide hospitality, that are for business purposes and which are not material or frequent.

Exchanging gifts, sharing a meal, and/or providing or receiving hospitality in connection with a legitimate business purpose can foster constructive relationships with business partners and other counterparties.

However, gifts, business meals and hospitality should never affect, or even appear to affect impartial decision-making by Lightsource bp employees, business partners, or any counterparty. They should never be offered or received in exchange for preferential treatment in any business dealing or in anticipation of receiving gifts or entertainment in return.

Hospitality is a strictly regulated activity which involves paying for a third party's (such as a government official or an employee of a commercial entity) travel, accommodation or daily living expenses and/or leisure activities in conjunction with their visit to a Lightsource bp office, site or other location, for the purposes of promoting, demonstrating or explaining the benefits of Lightsource bp services or technology.

We always follow laws or rules concerning the hospitality of government officials and any other of our business partners.

Certain gifts, business meals and hospitality can erode others' trust in Lightsource bp and must be avoided. These include any gifts, business meals or hospitality (including leisure activities) that appear to be bribes, raise questions about conflicts of interest for you or the Company, or would damage the Company's reputation.

It is never appropriate to attempt to bias a decision by offering personal benefits to a government official or anyone else.

We support laws prohibiting bribery and corruption, which often include stringent rules concerning gifts and hospitality involving government officials and other counterparties.



Preventing conflicts of interest

Conflicts of interest can happen if an employee’s personal, social, financial or political activities interfere, or potentially interfere, with their duty of loyalty to Lightsource bp.

Wherever possible conflicts of interest should be avoided, as even the appearance of a conflict of interest can be harmful to the Company. If they do happen, they must be disclosed via the Conflicts of Interests Register, and carefully managed with the support of our Compliance team.

There are many ways conflicts of interest can arise:

- Outside jobs and affiliations
- Jobs and affiliations of close relationship
- Board Directorships
- Investments



Deciding whether you have a conflict of interest is down to good judgement.

Ask yourself:

- Would this situation affect any decisions I make for the Company?
- How would it look to my co-workers? Would they think it could affect how I do my job?
- How would it look to someone outside the company, such as a customer or shareholder?
- How would it be perceived if it were reported in a newspaper?

If you think you might have a conflict of interest, or that other people might think you do, talk it through with your line manager.

Conflicts of interest can usually be resolved to everyone’s satisfaction, but they always need careful consideration and must be disclosed via the Conflicts of Interest Register.

Not disclosing a conflict may be a breach of your contractual obligations with Lightsource bp and could lead to disciplinary action.

Additional resources on the Lightsource bp Intranet:

- Lightsource bp Speak Up Policy and Procedure
- Lightsource bp Employee Handbook
- Lightsource bp Health, Safety & Environment Policies, Procedures and respective online training
- Lightsource bp Anti-bribery and Corruption and Anti-financial Crimes Handbook
- Lightsource bp Competition Compliance Handbook
- Lightsource bp Privacy Policy



Preventing financial crimes

Financial crimes is a term used to describe illegal activities including (but not limited to) money laundering, terrorist financing, and tax evasion or facilitation of tax evasion.

Money laundering is the process of concealing illicit funds or making them look as though they are legitimate. This includes concealing the criminal origin of money or other property, sometimes called the proceeds of crime, within legitimate business activities. It also covers the use of legitimate funds to support crime or terrorism.

Terrorist financing involves providing money or other property to groups, with the intention, knowledge or suspicion that those groups will use that money for terrorist purposes. Like money laundering, terrorist financing may also involve receiving money or property that represents a person’s benefit from committing terrorist acts. Similarly, concealing, transferring, removing or dealing in “terrorist property” is terrorist financing.

Tax evasion means deliberately or dishonestly cheating the public revenue or fraudulently evading tax. Facilitation of tax evasion means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that evasion.

We never condone, facilitate or support financial crimes, which means:

- We will always comply with financial crime laws and regulations, including but not limited to the UK Criminal Finances Act 2017.
- We will seek to minimise money risks through our anti-financial crimes policies and practices.
- We take reasonable and appropriate actions to identify and assess the integrity of the business partners and Counterparties we do business with.

Preventing tax evasion

Lightsource bp has tax obligations in every jurisdiction in which it operates. The nuances of local tax regulations are specific and peculiar to each country.

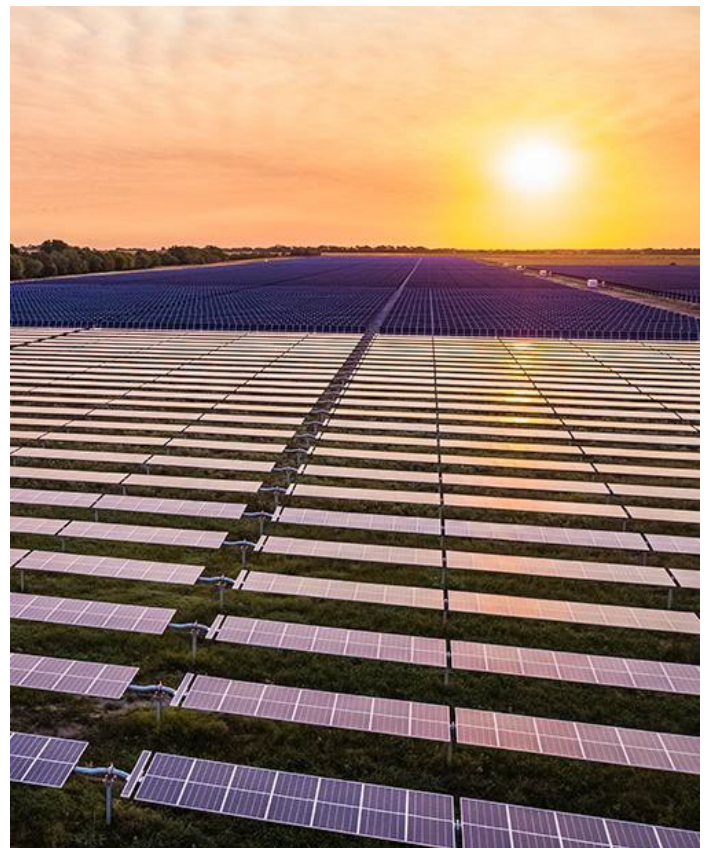
Lightsource bp operates to optimise and minimise its taxation burden in each jurisdiction, however we have a zero tolerance for performing any activities that seek to unlawfully evade our tax obligations.

Some jurisdictions (e.g. the United Kingdom) have specific legislation in place making tax evasion a criminal offence.

Such legislation imposes severe penalties for individuals, legal entities, associate persons or any related body that failed to prevent the committing of a criminal act.

You should always ensure that you are not conducting any activities that evade the payment of any type of tax.

If you have any questions about a specific circumstance, contact our Finance team.





THE GOVERNMENT & COMMUNITIES WE WORK WITH

We respect the world in which we operate. We are committed to our role in society and to meeting our obligations to the countries and communities in which we do business.

We depend on the relationships we have, respect the countries and communities we work with, and want them to benefit from us being there.

We aim to make real improvements that contribute to sustainable growth across the globe, by creating wealth, opportunities and jobs, developing useful skills, and investing our time and money in people.

We care about the consequences our decisions, large and small, have on those around us.

Lightsource bp will never engage in bribery, corruption or financial crimes of any form, whether in the private or public sector. Nor does Lightsource bp get involved in political activity or make political contributions.

Additional resources on the Lightsource bp Intranet:

- Lightsource bp Speak Up Policy and Procedure
- Lightsource bp Employee Handbook
- Lightsource bp Health, Safety & Environment Policies, Procedures and respective online training
- Lightsource bp Anti-bribery and Corruption and Anti-financial Crimes Handbook
- Lightsource bp Competition Compliance Handbook
- Lightsource bp Privacy Policy



Dealing appropriately with governments & government officials

Being open and transparent about our business and performance, good or bad, builds trust in Lightsource bp and encourages people to do business with us.

As Lightsource bp employees we must make sure that any information provided to government or regulatory officials is true and accurate, and that our legitimate business interests are protected.

This applies whenever we have contact with government officials during our work. It also applies if we are asked to provide information in connection with a government or regulatory agency enquiry or investigation.

Engaging with communities and respecting their rights and dignity

We want to make a positive difference everywhere we do business. We seek to conduct our business in a manner that respects the human rights and dignity of people.

We hold ourselves to the highest ethical standards and behave in ways which earn the trust of the communities in which we operate across the globe.

We work hard to create open and sincere relationships and cultural understanding with local communities, as well as with bodies such as non-governmental organisations (NGOs).

Communicating with investors, analysts and the media

Communications with investors, analysts and the media require care and a good understanding of legal and media issues.

Anyone breaching regulations, such as those governing the selective disclosure of non-public information, make themselves and Lightsource bp liable to prosecution.

Only authorised Lightsource bp employees should respond to enquiries from members of the investment community (e.g., shareholders, brokers and analysts) or the media.

It is the job of our dedicated Communications teams to make sure we communicate with all our key external audiences in a consistent and co-ordinated way.

If you have any questions or concerns about communications and external affairs, talk them through with your line manager, or Communications team, or via our Speak Up Program.

Our stance on political activities

Wherever we do business, our approach to corporate political activity is clear:

- Lightsource bp will not contribute to political fundraising campaigns.
- Lightsource bp will make no political contributions, either in cash or in kind.

We recognise our employees’ right to take part as individuals in the political process, in ways that are appropriate to each country. Employees who do this must make it clear that they do not represent Lightsource bp.

Although we do not directly take part in party politics, we do engage in policy debates and seek community consultation on subjects of legitimate concern to our Company, our staff and the communities in which we operate in various ways, including lobbying.

Lobbying activity on behalf of Lightsource bp’s interests is highly regulated and should only be done by colleagues authorised expressly by the Company

Contact your line manager or the Business Strategy or Communications team if you are not sure whether an activity is appropriate or might be misinterpreted.

Or if you would rather talk to someone independent in confidence, use the resources provided via the Speak Up Program.

