

Modern Slavery Statement

Reporting year ending 31 December 2025

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MODERN SLAVERY STATEMENT

19 June 2026

Introduction

This Statement

This statement, signed by our Group CEO Joaquin Oliveira, outlines the steps Lightsource bp¹ has taken to mitigate the risk of modern slavery and human trafficking in our supply chains and across our business. It covers the activities of all businesses in all jurisdictions within Lightsource bp and is our Modern Slavery Statement for the financial year ending 31 December 2025, as required under the provisions of the Modern Slavery Act 2015 (the “Act”).

This statement was prepared as a collaborative effort with contributions from various team members, including our Sustainability team and Procurement team, who are at the frontline of our relationships with our supply chain and our Ethics and Compliance team, who are responsible for human rights risk management.

Lightsource bp is a wholly owned subsidiary of BP p.l.c. References in this statement to 'Lightsource bp', 'we', 'our' and 'Group' refer to Lightsource BP Renewable Energy Investments Holdings Limited and its subsidiaries generally, (excluding BP p.l.c. and the rest of its subsidiaries).

Lightsource bp publishes this separate statement describing the policies, processes and actions it

¹ Lightsource bp in this statement means Lightsource BP Renewable Energy Investments Holdings Limited (incorporated in England with company number 15604635) (the “Company”) and its wholly owned subsidiaries. Lightsource BP Renewable Energy Investments Holdings Limited was incorporated in March 2024 to become the new parent company of the Lightsource bp group to facilitate the acquisition by bp of the remaining interest in Lightsource bp. The full list of subsidiary undertakings of the group is listed in the accounts of the Company filed at Companies House. Lightsource BP Renewable Energy Investments Limited (incorporated in England with company number 09494479), is the previous parent company of the group and is now a wholly owned subsidiary of the Company.

takes to mitigate the risk of modern slavery and human trafficking within its own business and supply chains. bp p.l.c. publishes its own Modern Slavery and Human Trafficking Statement covering bp and its subsidiaries (excluding Lightsource bp), which is available on bp's website.

What is Modern Slavery?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Modern slavery sits at the extreme end of the labour exploitation continuum, ranging from minor and major law violations to extreme exploitation. This continuum can make it difficult to identify at what point, for example, poor working practices and lack of health and safety standards escalate into instances of modern slavery in a work environment.

Our Commitments

We recognise our responsibility to respect human rights, as stated in the UN Guiding Principles on Business and Human Rights (UNGPs) and reiterated in the human rights chapter of the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

Lightsource bp is committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls that aim to ensure modern slavery is not taking place anywhere in our own business or in our supply chain, and if found, to seeking to address it.

Our Business, Supply Chain and Organisational Structure

Our Business

Lightsource bp is a global onshore renewable energy and storage business. Until October 2024, Lightsource bp operated as a 50:50 joint venture between bp and Lightsource. In October 2024, bp acquired the remaining interest in Lightsource bp, creating a platform for onshore renewable development combining wind, solar and battery energy storage systems (BESS). While bp has taken on full ownership, Lightsource bp continues to operate under its standalone operating model and

independent brand, delivering renewable energy to businesses and communities across the world.

At Lightsource bp, we develop, finance, build and operate utility-scale solar, wind and BESS projects through smart and sustainable solutions:

- Headquartered in London, United Kingdom.
- Over 1,000 team members around the world.
- Operating across three global regions. For more information: [Location Selector | Lightsource bp](#).
- 14.2 GW total projects developed as of 2025.
- 6.4 TWh of renewable energy delivered from owned assets in 2025.
- 52.4 GW total development pipeline.

Our Supply Chain

Lightsource bp develops, constructs and operates solar and battery storage projects using equipment, materials and services sourced from a global network of suppliers. We do not manufacture equipment or supply raw materials ourselves. Instead, we procure key components and services through third-party manufacturers and through our engineering, procurement and construction (EPC) and operations and maintenance (O&M) partners.

Our key supply chain categories include solar modules, inverters, transformers, trackers, battery storage systems, wind components. These supply chains are complex and multi-tiered, often spanning several jurisdictions and involving multiple upstream suppliers. As a project developer and asset owner, our direct contractual relationships are typically with Tier-1 suppliers; however, we recognise that human rights risks, including those related to modern slavery, may occur deeper in the supply chain.

To address these challenges, we apply a risk-based approach to supply chain management, focusing our efforts on higher-risk geographies, sectors and supplier categories. Particular attention is given

to critical equipment supply chains, such as solar modules and battery energy storage systems, where global manufacturing networks can present heightened human rights risks.

Our approach integrates pre-contractual due diligence and contractual requirements for suppliers. Suppliers in higher-risk categories are assessed against environmental, social and governance (ESG) and traceability criteria during our supplier selection process. For those suppliers we require independent ESG and traceability audits, carried out by experienced third-party auditors, to assess supplier practices and verify information relating to human rights risks, including forced labour and modern slavery indicators.

Suppliers participating in our procurement processes are expected to meet our sustainability and human rights standards, including those set out in our Responsible Sourcing Policy and ESG and Traceability Specification. Where significant deviations from these expectations are identified, they may trigger corrective action plans or contractual remedies.

Improving transparency beyond Tier-1 suppliers remains a strategic priority. Once a supplier is selected for a project, we require them to provide supply chain mapping and evidence of due diligence conducted within their own supply chains, including information on upstream manufacturing locations and risk management processes. For sub-suppliers in higher-risk categories, we request additional independent ESG and traceability audits, carried out by experienced third-party auditors.

Through these measures, we aim to strengthen supply chain transparency and support responsible business practices to help mitigate modern slavery within the renewable energy value chain.

Modern Slavery Risk Management Governance

Our governance structure underwent a change in October 2024, following the full acquisition of Lightsource bp by bp.

Our corporate governance structure is designed to drive informed decision-making through a clear assignment of responsibilities. We take a coordinated approach to risk management through our enterprise risk management (ERM) framework. The ERM framework aims to provide guidelines and

best practices on the structure and processes of corporate risk management.

The Executive Management Committee (EMC) has delegated responsibility for day-to-day risk management, including human rights and modern slavery in accordance with the company's governance framework and Delegation of Authority.

The Lightsource bp governance structure for risk management activities includes three lines of defence with the following representatives:

- Executive Management Committee.
- Business Units (1st line of defence).
- Group Risk Department (2nd line of defence).
- External/Internal Audit (3rd line of defence).

As part of the second line of defence, the Group Head of Risk, Treasury and Insurance chairs distinct risk forums to cover all risk topics, including sustainability and compliance, and facilitates discussion and decision-making, including the Functional Risk Committee (FRC) and the Counterparty Risk Forum.

Relevant departments represented at the FRC include Ethics & Compliance and Sustainability, which enables us to assess and manage risk. Functional assurance is provided by the Ethics & Compliance and Sustainability teams for projects at early and late stage, acquisitions and for new market entries. The process allows identification of a wide range of environmental, social and governance (ESG) risks and mitigants, including for human rights and modern slavery. Risks are identified, rated and highlighted as part of the FRC and then monitored, including the implementation of any mitigants. This process matures our granular identification of risks and has facilitated improved visibility of our potential exposure.

Our Sustainability Steering Committee, established in Q1 2024, has played a critical role in enhancing alignment between different functions with sustainability accountabilities and responsibilities and has provided critical constructive review of programmes and policies. Members are senior leaders

within the business (typically direct reports to the executive team) who approach their role with commitment and openness.



Responsibility for identifying human rights and modern slavery risks within our business is shared across the organisation (1st line of defence). As outlined below, we offer training to team members on how to identify signs of modern slavery and what to do if any signs are identified. More targeted front-line defence in the identification of human rights and modern slavery risks resides with our Procurement, Tenders & Contracts, Health Safety & Environment and Sustainability teams who are responsible for implementing our Responsible Sourcing Policy with respect to our suppliers and contractors (see more in the “Our policies” section below).

If a human rights or modern slavery risk is reported through the Speak Up program or has otherwise been suspected, the responsibility for assessing and recommending a response to the EMC sits with our Chief Compliance Officer, who reports to our Group General Counsel.

Assessing and Managing Risk

Human Rights Risk Assessment

Lightsource bp engaged a third-party consultant to carry out its initial Human Rights assessment in

2021, led by the Ethics and Compliance team. The objectives of this assessment were to:

- Identify key countries and sectors' human rights risks.
- Assess the efficiency of systems and processes in place to manage human rights risks.
- Propose recommendations to improve our systems and processes.

The assessment involved interviews with internal stakeholders and was informed by desktop research using publicly available sources as well as the consultant's internal field data, contacts and intelligence to identify key and relevant human rights risks.

The assessment identified that labour rights and modern slavery risks could be an area of risk for Lightsource bp in procurement, construction, and maintenance, as sectors which are prone to such risks globally.

The manufacturing sector was identified as an industry where human rights risks are prevalent globally, driven by the fact that it often relies on cheap labour. Risks are heightened in countries with weak labour laws or insufficient enforcement. The solar panel manufacturing sector was also seen as a sector with a higher risk of human rights violations.

The construction sector was identified as an industry which typically relies on subcontracting, which can result in increased labour risks, such as:

- Forced labour due to a high proportion of migrant workers.
- Excessive working hours.
- Workers falsely declared as independent workers.
- Labour exploitation due to the increasing use of temporary contracts.
- Uncertainty as to who is the real employer and therefore who should bear responsibility for workplace conditions, safety and benefits.
- Undeclared employment to evade regulatory requirements, workers' protections and

entitlements.

- Wage theft and wage withholding.
- Substandard accommodation.
- Relatively high health & safety risks.
- Lack of access to grievance channels.

Within Lightsource bp's own operations, human resources and talent acquisition were considered to be a lower risk to the business based on the skill level of Lightsource bp's talent pool. However, it identified that rapid expansion into new markets would require sufficient oversight from the global headquarters to ensure Lightsource bp's standards on human rights are applied in hiring new employees in new markets.

The assessment also evaluated Lightsource bp's management systems across compliance and counterparty risk management, human resources, construction and operations and procurement, identified gaps and risks and made recommendations for improvement. The assessment has constructively informed Lightsource bp's improvements to systems, policies and processes.

Building on the findings of the 2021 assessment, Lightsource bp has embedded human rights risk identification within its broader risk management and project governance processes. Human rights risks are assessed on an ongoing basis through internal risk forums, project development reviews and procurement processes, helping ensure that potential impacts are identified across the lifecycle of our activities.

Risk identification is supported through our three-lines-of-defence governance framework and through cross-functional collaboration between Sustainability, Ethics & Compliance, Procurement, Health, Safety & Environment and Risk teams. These functions contribute to the identification and evaluation of environmental, social and governance (ESG) risks, including potential human rights and modern slavery risks, through internal risk forums such as the Functional Risk Committee.

Our risk identification processes are triggered by key business activities and external developments,

including entry into new markets, the development or acquisition of new projects, onboarding of new suppliers and contractors and relevant regulatory developments. Through these processes, potential risks can be identified at an early stage, and appropriate mitigation measures can be implemented.

In addition, Lightsource bp considers insights from external stakeholders and industry initiatives to inform its understanding of evolving human rights risks. We monitor reports from organisations such as Sheffield Hallam University and the Business & Human Rights Resource Centre, and we participate in sector initiatives including the Solar Stewardship Initiative and Solar Power Europe, which help inform our risk assessments and support implementation of our Responsible Sourcing Policy.

Assessing Risk Through Our Procurement Process

As part of our commitment to continuously strengthen our ability to identify and manage risk, including risks related to human rights and modern slavery, Lightsource bp has implemented an approach that integrates risk management throughout the lifecycle of our relationships with suppliers and contractors. Our approach spans supplier selection, contracting, onboarding and ongoing contract management.

Our responsible procurement strategy incorporates a structured due diligence process designed to identify, assess and address potential human rights risks within our supply chain. This process enables ongoing monitoring, management and remediation where necessary. Our approach is aligned with the six-step due diligence framework outlined in the OECD Due Diligence Guidance for Responsible Business Conduct, which underpins our efforts to promote socially responsible and sustainable supply chains.

In addition, for supply chains involving high-risk and conflict-affected minerals, we reference internationally recognised guidance such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to further strengthen our risk assessment and traceability practices.

Our processes include supplier due diligence, supply chain risk screening and enhanced scrutiny of higher-risk categories and geographies. During the reporting year, we continued to strengthen our approach to addressing potential modern slavery risks within our supply chain. This included further

improvements to suppliers' ESG due diligence processes, through supplier engagement, enhancements to traceability management systems and the collection of documented evidence supporting supply chain mapping for critical components. We also continued to work collaboratively with our supply chain partners to monitor the implementation of corrective and improvement plans aimed at preventing and mitigating potential risks.

Insights from supplier due diligence, ESG audits and traceability reviews are also used to inform updates to our responsible sourcing framework, policies and contractual requirements, enabling Lightsource bp to strengthen its systems for future engagements.

Stakeholder Engagement in Risk Assessment

Recognising that human rights risks cannot be addressed by individual companies alone, Lightsource bp actively collaborates with industry initiatives and peer organisations to improve transparency and raise standards across the sector. We participate in industry forums such as the Solar Stewardship Initiative (SSI) and the Solar Energy Industries Association (SEIA), Solar Power Europe (SPE) and Solar Power UK (SPUK) where we contribute to discussions on responsible sourcing, traceability and best practices in solar supply chains.

Due Diligence in Relation to Modern Slavery

Lightsource bp's supply chain encompasses a complex network that spans a wide spectrum of risk levels, with corresponding variations in legal and due diligence requirements. Our categorisation is based on product or activity risk, country risk and business criticality.

During the reporting year, Lightsource bp continued to deploy our sustainability due diligence process (available [Link](#)), aligned to the OECD six-step model for responsible business conduct. This process is implemented using a risk-based approach and applies globally to key equipment suppliers, including solar modules, batteries, inverters, high-voltage transformers and mounting structures. The framework is progressively being extended to EPC and interconnection provider partners.

Initial Due Diligence

Supplier pre-qualification and qualification process involve several robust steps designed to identify

potential risks before engagement. These include the use of third-party screening platforms, onsite and desktop ESG audits and traceability audits where appropriate. These assessments help evaluate key areas such as supply chain management practices, business ethics, labour standards and environmental performance.

ESG Audits

Lightsource bp adopts a risk-based approach to supplier due diligence. ESG assessments and audits are conducted for suppliers and contractors assessed as higher risk and evaluate compliance with our policies and standards, with a particular focus on human rights, labour practices and ethical governance.

Audits are conducted in line with internationally recognized frameworks and principles, including the ILO Core Labour Standards and the Declaration of fundamental Principles and Rights at work, the UN Guiding Principles on Business and Human Rights and the OECD due diligence guidance for Responsible Business Conduct.

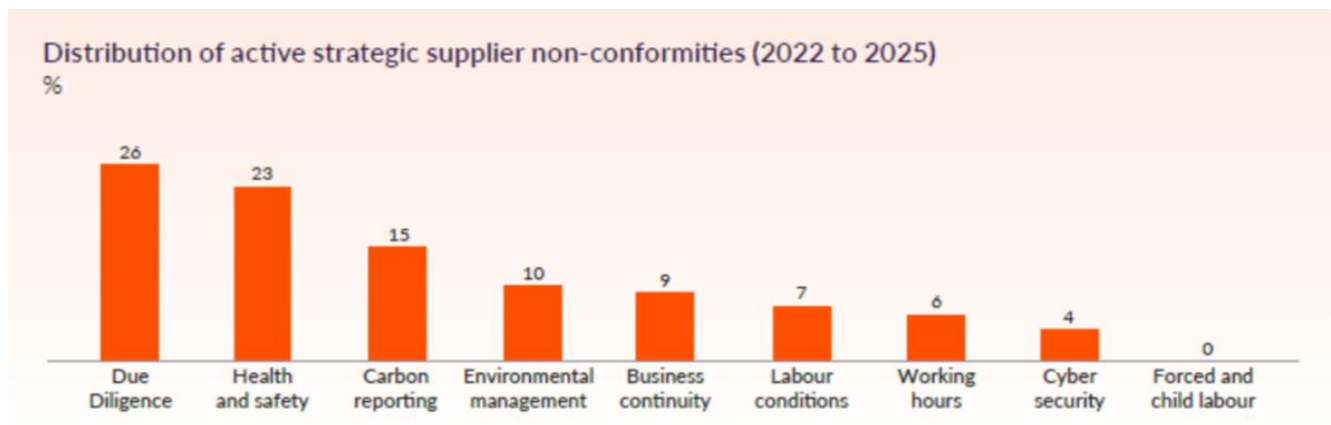
The output of the selection process categorises suppliers as approved, conditional approved or not qualified. Those scoring below 50% are considered 'not qualified', and engagement is suspended until they demonstrate significant, meaningful improvement. Those with 'conditional approved' can only proceed once they provide a contractual commitment to implement an improvement plan.

Each non-conformity triggers a corrective action plan with defined timelines and follow up verification. We actively engage with suppliers to support remediation and continuous improvement, monitoring progress until issues are resolved. These corrective action plans are designed not only to address individual non-conformities but also to remedy potential adverse human rights impacts identified during the audit process and to strengthen suppliers' management systems to prevent recurrence. For major non-conformities, such as non-compliance with regulations or issues related to labour conditions, environmental management or worker safety that may lead to serious incidents, the implementation of corrective action plans is contractually required.

Through our ongoing monitoring and engagement with active strategic suppliers, 85% of non-conformities identified since 2022 have been successfully closed. The remaining 15% are non-

conformities that require longer-term engagement and supplier capability development. We maintain active corrective action plans and continue to work closely with suppliers to achieve full closure.

Across the 32 audits conducted in 2025, a total of 123 non-conformities were identified, including 29 major non-conformities. For strategic suppliers in 2025, 74% of the non-conformities identified during the year have already been closed, including all major non-conformities.



The chart above illustrates the distribution of non-conformities identified through our ESG supplier audits in our active strategic suppliers from 2022.

The most frequent findings related to supply chain due diligence and traceability practices, as well as health and safety management, highlight areas where suppliers continue strengthening internal processes and risk management frameworks. Labour conditions and working hours represent 10% of findings. Importantly, no non-conformities related to forced labour or child labour were identified during the audits.

Where serious breaches of our ESG requirements are identified and not adequately addressed, we retain the right to apply contractual remedies, including escalation measures or termination of the business relationship. However, our primary approach is to work with suppliers to implement mitigation measures and strengthen their ESG performance.

Traceability Audits

Our traceability audit programme continued to demonstrate strong and consolidated progress in

2025. All PV module and BESS suppliers in our approved vendor list were subject to traceability audits.

The majority of PV module suppliers are now able to trace their supply chains beyond the polysilicon level, and suppliers are conducting audits at upstream locations within their supply chains to strengthen supply chain transparency.

In 2025, we initiated traceability audits with BESS suppliers, aligning our requirements with relevant regulatory requirements and recognised industry guidance relating to responsible sourcing and supply chain due diligence.

All BESS suppliers assessed reached conditional approved status, subject to the implementation of improvement plans designed to address identified gaps and ensure full alignment with our responsible sourcing requirements for projects in 2026.

Ongoing Monitoring

To enable continuous improvement, we track both the implementation and the results of our supply chain initiatives, and those we have required our counterparties to enact. We prioritise regular meetings with suppliers, which are now a key component of our category managers' agenda. These discussions focus on fostering strong partnerships, sharing best practices, and driving the improvement of shared sustainability efforts.

Where corrective action plans are agreed with suppliers, Lightsource bp monitors implementation through regular supplier engagement, progress tracking and follow-up verification by Lightsource bp or independent auditors before issues are considered closed.

Concerns or grievances can be raised via our Speak Up channels. If we identify instances of modern slavery or forced labour, we will take suitable action, which may include terminating discussions and/or existing relationships with the counterparty in question and notifying relevant authorities of the issues involved.

Regular reporting is given to relevant functions and Executives to ensure the sustainability and compliance of our supply chain.

Our Policies

As we continue to expand our business, we are committed to holding ourselves to high standards and ensuring there is transparency in our own business practices and in our approach to addressing modern slavery throughout our supply chains.

We expect the same high standards from all our contractors, suppliers, subcontractors and other business partners. This is supported by the incorporation of policies such as our Code of Business Conduct and Ethics in contracts, in addition to other key sustainability requirements. All counterparties involved in the development, construction and operation of a Lightsource bp project are required to comply with these policies and contractual requirements and to pass these obligations on to their subcontractors and their suppliers. The following policies and codes form the basis of our requirements.

Human Rights Policy

Our Human Rights Policy (available [here](#)) clearly states our commitment to respecting human rights, consistent with UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, 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. The policy includes an overview of how we embed this in Lightsource bp's ways of working.

Code of Business Conduct and Ethics

Lightsource bp's Code of Business Conduct and Ethics (our "Code," available [here](#)) sets out our core values and makes clear that we, as a business, respect the law, support universal human rights and take great care to respect the people and cultures of the communities we work with worldwide. It sets out the principles that guide our own operations and those that apply to our business partners and counterparties.

In respect of human rights, our Code sets out that we want to work with business partners that share our commitments to human rights, safety, ethics and compliance and that we seek to use our

influence, 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 our Code.

Code of Business Conduct and Ethics for Counterparties

Lightsource bp has a separate Code of Business Conduct and Ethics for Counterparties (the “Code for Counterparties”, available [here](#)), which sets out our expectations and commitments of those with whom we do business. This includes joint venture partners and developers, vendors, suppliers, contractors, customers, land agents, service providers, consultants and any sub-contractors thereof. An obligation to comply with our Code for Counterparties is included in Lightsource bp’s contracts and agreements. One of the key expectations and commitments contained within this Code for Counterparties is respect for the human rights and dignity of all people. Counterparties are pointed to the UN Guiding Principles on Business and Human Rights for guidance and are expected to take steps to ensure there is no use of forced or compulsory labour, human trafficking, child labour, slavery, or servitude in their business activities and, if found, we require our counterparties to commit to remedy this.

Our ‘Speak Up’ Programme

Relevant to both the Code and the Code for Counterparties is Lightsource bp’s Speak Up programme, which encourages anyone, inside or outside Lightsource bp, to speak up if they see or suspect instances not aligned with our codes, policies or the law, including human rights abuses.

The Speak Up programme provides several avenues for issues to be raised and is available in multiple languages, including a multilingual telephone service and a confidential and anonymous portal.

Guidance on how to speak up is included in our Code and our Code for Counterparties. Lightsource bp has a zero-tolerance policy with respect to retaliation for concerns raised in good faith.

Responsible Sourcing Policy

During 2025 we focused on the operational integration of our Responsible Sourcing Policy across procurement and supply chain management processes. The Policy, published in 2025, outlines Lightsource bp’s approach to sustainable sourcing, guiding our suppliers and stakeholders in aligning

with our commitment to sustainability. The policy serves as a framework for integrating ESG considerations into our sourcing processes, ensuring that our supply chain not only meets our high standards of quality but also contributes to a more sustainable and equitable world. The policy sets out our commitment to the prevention of forced labour, child labour and any form of exploitation in our supply chain.

ESG Traceability Specification

A key milestone during the reporting period was the development and deployment of Lightsource bp's ESG and Traceability Specification for critical equipment supply chains, including solar modules and battery energy storage systems (BESS). This specification was developed in collaboration with key suppliers and informed by external standards, as well as feedback from customers and other stakeholders.

The ESG and Traceability Specification has been designed to ensure alignment across Lightsource bp teams and with both upstream and downstream partners regarding expectations for responsible sourcing, supply chain transparency and due diligence practices.

Under this framework, module suppliers are expected to maintain internal systems that support effective due diligence to identify higher-risk suppliers, materials, and components within their supply chains. These systems include traceability management processes that allow suppliers to trace the origin and movement of critical materials from upstream suppliers through to finished products. Where relevant, traceability expectations extend to upstream material flows, including smelters, refiners and other processing facilities associated with high-risk or conflict-affected mineral supply chains.

The specification requires suppliers to integrate material traceability information into their supply chain management processes and to provide documented evidence supporting the provenance of key materials and sub-suppliers involved in production. Suppliers are also expected to conduct ESG due diligence within their own supply chains and implement appropriate risk management measures where potential risks are identified.

By strengthening supply chain traceability and due diligence practices, this specification supports our

broader efforts to identify, prevent and mitigate potential human rights risk, including risks related to modern slavery, within complex global supply chains.

Communication and Enforcement of Our Policies

From the earliest stages of our engagement with potential counterparties, we communicate our expectations through the Code of Conduct for Counterparties.

During our tender, contract and procurement process, we communicate our Responsible Sourcing Policy, ESG Traceability Specification and Due Diligence Process to our contractors and module suppliers, and only those that can meet the requirements are included for consideration. Our contracts include obligations to comply with our Code of Conduct for Counterparties and to ensure that modules being supplied meet the ESG Traceability Specification.

Counterparties involved in the development, construction, and operation of a Lightsource bp project are contractually required to comply with our Code of Business Conduct and Ethics for Counterparties. Further, our Compliance Schedule, which is attached to all relevant material contracts, includes obligations on Ethical Labour, Supply Chain Traceability and Responsible Sourcing. Counterparties are required to only use subcontractors or sub-suppliers that agree to comply with the Code of Business Conduct and Ethics for Counterparties and our Compliance Schedule by passing down those requirements or at least equivalent standards throughout their supply chain.

Training

Lightsource bp provides training on our values and on our Code of Business Conduct and Ethics. These underpin and reinforce the elements of our human rights commitments. We continue to develop the appropriate capability and resources for our operational teams and support them with expert technical guidance. Follow-up training is primarily aimed at people who work on our projects, in operational roles and in functions such as human resources, legal and ethics and compliance.

Meeting our supply chain sustainability aim relies on the work of people across the business. This year, we focused on delivering training to ensure our people are aware of our risks and processes.

A 'Modern Slavery in Supply Chains' module (an interactive e-learning programme) was made

available to all team members. The course explains what modern slavery is, situations where it might be more likely to take place and initiatives being taken to put a stop to it.

Further, several company-wide sessions were delivered, aiming to educate our people on the importance of responsible sourcing through Lightsource bp specific case studies. With speakers from various teams across Lightsource bp, the sessions covered our ethical procurement process and due diligence practice. Targeted training for specific functions also continues.

Supporting Sector-wide Approaches

Collaboration with our suppliers and our industry is a cornerstone of our approach to a sustainable supply chain. In 2024, we strengthened partnerships with suppliers in key areas, including improving traceability and enhancing labour practices. We continued meeting with key suppliers to discuss improvement areas and to share expertise.

Lightsource bp partners with trade bodies who are dedicated to supporting the industry on due diligence and sustainable procurement. In 2024, we continued our active membership of the Supply Chain Sustainability and Product Sustainability workstreams within Solar Power Europe (SPE) and supported SPE and Solar Energy UK (SEUK) in the launch of the Solar Stewardship Initiative (SSI). This initiative aims to provide an industry standard for ESG and supply chain traceability, and we continue to be highly engaged in the development and pilot stages. We have also signed the Solar Energy Industries Association (SEIA) Forced Labour Prevention Pledge and support the Clean Energy Council (CEC) Pledge Against Modern Slavery. We participate as an active member in the SEIA traceability protocol Technical Committee. As involved members, we will seek to identify ways that aim to ensure that the rights of workers vulnerable to forced labour in global supply chains are consistently respected and promoted.

Future Plans

Lightsource bp recognises, in common with its peers, adjacent markets, and other industry sectors, the importance of accurate and timely information to inform our business decisions. We will continue to work with our trade bodies, government actors and interested stakeholders to improve the quality, visibility and accuracy of data throughout a complex supply chain essential to the continued ethical,

transparent development of renewable energy sources.

Looking ahead, we will continue to strengthen our responsible sourcing approach and modern slavery risk management processes. Over the coming year, we intend to:

- Continue working with our supply chain partners to monitor the implementation and effectiveness of corrective action and improvement plans resulting from ESG and traceability audits.
- Develop and implement responsible sourcing specifications and due diligence processes for wind equipment supply chains, ensuring that traceability, responsible sourcing and human rights risk assessments are embedded from the early stages of supplier engagement and procurement.
- Further enhance transparency and visibility across our critical supply chains by improving supply chain mapping and risk identification beyond Tier – 1 suppliers.
- Explore digital solutions to strengthen supply chain mapping, risk screening and traceability management; finalise requirements and cost-risk analysis once regulatory guidelines are completed.

Nature of This Statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Lightsource bp Group's slavery and human trafficking statement for the financial year ending 31 December 2025. It was approved by the Executive Management Committee in line with the Modern Slavery Act on 19 June 2026.



Signed by **Joaquin Oliveira, Group CEO**

19 June 2026