



Anti-Slavery and Human Trafficking Policy

FOTOWATIO RENEWABLE VENTURES, S.L.
and SUBSIDIARIES

Revision 2, adopted 25th September 2024



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1. INTRODUCTION

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as Slavery, servitude, forced and compulsory labor, coercion, threats or deception to exploit victims and Human Trafficking, all of which have in common the deprivation of a person's freedom by another for the purpose of exploiting that person for personal or commercial gain.

This Policy elaborates on the guidelines contained in FRV's Code of Conduct and constitutes FRV's framework for combating Slavery and Human Trafficking.

The Policy is communicated to all FRV Employees and all FRV Employees must read and understand all aspects of this Policy and comply with it, which Employees confirm annually through their Code of Conduct attestation.

Relevant sections of this Policy and Code of Conduct will be communicated to Third Parties in accordance with the Third-Party Relations Protocol by disseminating copies of the Anti-Slavery and Human Trafficking Policy and the Third-Party Code of Ethics and requiring compliance with these as a minimum (and in some cases also, FRV's end-user compliance policies).

2. DEFINITIONS

- **Slavery, servitude, and forced or compulsory labor:** any work or action performed involuntarily and under threat.
- **Human Trafficking:** organizing, recruiting, exchanging, harboring, receiving, or facilitating the travel or transportation of another person for the purpose of carrying out any form of exploitation of that person.
- **Exploitation:** subjecting, by force or through threats and/or deception, a person to perform any activity or action, including those of a sexual nature, removal of organs, etc.

3. PURPOSE

The purpose of this Policy is to establish a framework for action to ensure **FRV's zero tolerance of Human Trafficking and modern Slavery**. In this regard, FRV is convinced that Human Trafficking and modern Slavery must be combated as serious human rights issues.

4. SCOPE

This Policy applies to all directors, employees, agents, consultants, and representatives of the Company, whether they belong to FRV or any of its affiliates (all collectively referred to as "**Personnel**" or the "**Company**"), as well as to FRV's agents, contractors and their supply chains, consultants, joint venture partners, sponsors, suppliers, and representatives ("**Third Parties**"). When certain provisions are intended to apply only to the directors and employees of the Company, references to the term "**Employee**" are used.

5. GOVERNANCE

FRV's Chief Compliance Officer (hereinafter "CCO") has the primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, addressing with any queries about it, and auditing internal control systems and procedures to ensure that they are effective in the fight against modern Slavery.

In this regard, the CCO will organize training sessions, face-to-face or online, on this Policy, attendance of which is mandatory.

Management at all levels is responsible for ensuring that employees understand and comply with this policy.

6. GENERAL PRINCIPLES

The actions carried out by the Personnel and Third Parties must always be respectful of the following principles:

- **Zero tolerance for modern Slavery:** All Personnel must be committed to combating any actions that may promulgate, favor, cover up or encourage any work or action that is carried out involuntarily and under threat.
- **Integrity, ethics and professionalism:** The business and professional activity of FRV and the Staff must be based on the principles of integrity, honesty, ethics and professionalism.
- **Due Diligence:** FRV shall take all necessary and effective measures to identify, prevent, mitigate, account for, and respond to negative impacts of its own activities and those of Third Parties with whom it interacts, insofar as they affect human rights.
- **Transparency in the supply chain:** FRV is committed to complying with the law, respecting the rules of the market, and not succumbing to corrupt practices that may encourage activities related to modern Slavery, Human Trafficking, exploitation or forced labor.

7. GUIDELINES OF CONDUCT

The following are the **guidelines of conduct** that all Personnel must observe in the conduct of their professional activity:

1. **Systems and controls for the prevention of modern Slavery:** FRV has a zero-tolerance approach to modern Slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern Slavery does not take place anywhere in our own business or in any of our supply chains. We take steps to ensure compliance with relevant guidelines, including, but not limited to, the 1948 United Nations Universal Declaration of Human Rights, the 1989 United Nations Convention on the Rights of the Child and the 1976 International Covenant on Civil and Political Rights, the Council of Europe Convention for the Protection of Human Rights and Fundamental Freedoms, the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, ILO Convention No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor.

2. **Own and Third-Party commitment against modern Slavery:** We are also committed to ensuring that there is transparency in our own business and in our approach to addressing modern Slavery across our supply chains, in line with the disclosure obligations set out in the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 and the U.S. Uyghur Forced Labor Prevention Act 2022.

We expect the same high standards from all our Third Parties and, as part of our procurement processes, we include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in Slavery or servitude, whether adults or children, and we expect our suppliers to hold their own suppliers to the same high standards. Our zero-tolerance approach to modern Slavery in our business and supply chains must be communicated to all Third Parties at the outset of our business relationship with them and reinforced as appropriate thereafter.

3. **Commitment to legality and prevention of international financial sanctions:** Modern Slavery and Human Trafficking can also be relevant factors in the U.S., EU, and U.K. sanctions framework, so this Policy should also be read in conjunction with FRV's Sanctions Policy, which sets out the framework with respect to U.S., the EU and the UK sanctions.

In order to guarantee the implementation of these commitments, the Company has a set of procedures and controls in the processes and activities affected by these risks. All this is included in the *"Supply Chain Management Procedure"*.

8. COMPLIANCE & REPORTING

The prevention, detection and reporting of modern Slavery in any part of our business or supply chains is the responsibility of all those who work for us or are under our control.



Personnel and Third Parties have a duty to report any knowledge or reasonable suspicion about possible breaches of this Policy in any part of our business or supply chains at any supplier level, in addition to direct communication with their line manager, the CCO or any member of senior management, who will have a confidential and anonymous **Communication Channel**, accessible through the Intranet and the Corporate Website, or directly by entering the following address in the Internet search engine:

<https://frv.canalhelas.com/home>

FRV will not tolerate any form of retaliation, discrimination, or penalty against those who report in good faith. Notwithstanding the foregoing, the Company reserves the right to take disciplinary action in accordance with the provisions of the disciplinary regime if the complaint submitted is found to be false and in bad faith.

Similarly, Personnel and Third Parties may raise any questions or doubts they have about the interpretation of the Code (Code of Conduct or Third-Party Code of Ethics) through the aforementioned means.

Please note that, where appropriate, and with the welfare and safety of local workers as a priority, we can provide support and guidance to our suppliers to help them address coercive or exploitative labor practices in their own business and supply chains.

Breaches of this Policy by Personnel may result in the imposition of **disciplinary action** by FRV, including suspension, termination and, in some cases, civil and/or criminal liability, in accordance with the applicable disciplinary regime and employment law. In addition, Third Parties should similarly expect their contracts to be terminated for cause if they violate this Policy, and FRV reserves the right to seek compensation for damages resulting from breaches of this Policy.



9. REVIEW AND APPROVAL

This Policy shall enter into force after its approval by the Board of Directors and must be communicated to all Personnel and Third Parties.

The Policy must be reviewed periodically, and at least every three years, in order to promote its updating, and to incorporate regulatory, organizational or activity changes in the Company.

The Board of Directors is responsible for approving modifications to the Policy in order to improve or adapt it to legal requirements, to the highest standards and good ethical practices or to new needs that may be detected.



APPENDIX 1

RECEIPT AND ACKNOWLEDGEMENT OF RECEIPT –

I, as [____], declare that I have received, read, and understood FRV's Anti-Slavery and Human Trafficking Policy Revision 2 – Adopted on September 25, 2024, and that I agree to comply with all its provisions.

By:

Date: [____]



APPENDIX 2

CERTIFICATE OF COMPLIANCE

To: Fotowatio Renewable Ventures S.L. ("FRV")

María de Molina 40, 5th floor

28006, Madrid, Spain

Dear Sirs,

I [___] as a duly authorized representative of [___] ("**the Company**") certify that all information provided to FRV in connection with this investigation corresponds to and reflects the current situation of the Company and that, to the best of our knowledge and belief, there is no event that could affect any of the statements provided to FRV in the input Excel file provided ("FRV Supplier Questionnaire").

With respect to the Compliance section in the input Excel file, I hereby certify, to and on behalf of the Company, the following:

- (a) The Company has received and understood that it must comply with FRV's anti-corruption policy, anti-slavery and anti-trafficking policy, the Third-Party Code of Ethics and, where provided, FRV's customer codes of conduct. All terms defined in this certificate have the meanings assigned to them in FRV's Third-Party Code of Ethics.
- (b) The Company agrees to require its subcontractors and suppliers in connection with FRV's contracts to comply with the terms of the anti-corruption policy, the anti-slavery and anti-trafficking policy, the Third-Party Code of Ethics and, where provided, FRV's customer codes of conduct.
- (c) The Company undertakes to conduct U.S., UK, EU, Australian, and UN sanctions screening on its subcontractors and suppliers (and will provide sufficient information to enable FRV to conduct its own sanctions screening process on such entities).
- (d) The Company and all of its affiliates, subsidiaries, subcontractors and suppliers comply (in effect as of the date of this Certificate) with all applicable Anti-Corruption Laws (including any anti-corruption or anti-



bribery laws, regulations or requirements of any jurisdiction enacted, promulgated or approved after the date of the Agreement that are applicable to FRV) and Labor Laws in particular, those related to working conditions, anti-Slavery, anti-Human Trafficking, social security contributions, tax obligations, health and safety, environmental protection and data privacy.

(e) Neither the Company nor any of its affiliates or subsidiaries (i) has made, offered, authorized or promised to make any prohibited payment, directly or indirectly, in contravention of any Anti-Corruption Law; (ii) has subjected to abused any person it employs or any person with whom its personnel works, or has knowledge of any Slavery or Human Trafficking taking place in its supply chains, facilities, or any part of its operations; (iii) is a sanctioned party under any U.S., UK, EU, Australian, or UN sanctions or has made any payments in contravention of any such sanctions; or (iv) has taken any action or engaged in any activity that could reasonably be expected to expose FRV (or any of its affiliates) to any risk of criminal or civil penalties under any applicable Anti-Corruption, Labor or Anti-Corruption Law.

(f) Each of the representations set forth in the compliance section of the input Excel file is true and correct in all respects as of the date of this Certificate.

(g) **The Company** further agrees that if subsequent developments make this certificate no longer accurate, **the Company** will immediately inform FRV of such change in circumstances.

Date by:

Printed name:

Title: