#### **GREENCOAT UK WIND PLC**

#### MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This voluntary statement is made on behalf of Greencoat UK Wind PLC (**Company**) and Greencoat UK Wind Holdco Limited (**Holdco**) (together, the **Greencoat UK Wind Group**) pursuant to section 54 of the Modern Slavery Act 2015 (the **Act**) and constitutes our slavery and human trafficking statement for the year ending 31 March 2023.

This statement sets out how the Greencoat UK Wind Group incorporates its social, environmental and governance (**ESG**) agenda which comprises human rights including modern slavery and human trafficking issues in its own business and its supply chains.

#### Our structure, business and supply chains

Greencoat UK Wind plc is the leading listed renewable infrastructure fund, invested in operating UK wind farms. The Company is a constituent of the FTSE 250 and aims to provide investors with a sustainable annual dividend per ordinary share that increases in line with RPI inflation while preserving the portfolio's capital value on a real basis over the long run through reinvestment of excess cashflow and prudent use of gearing. The Board of Directors of the Company (the **Board**) comprises four independent UK non-executive directors and one independent Irish non-executive director. The Company has delegated the day-to-day management of its business, including ESG matters, to Schroders Greencoat LLP (Schroders **Greencoat** or **Investment Manager**).

Holdco is the sole direct subsidiary of the Company and is a holding company investing in special purpose vehicle (SPV) companies which, as of 31 March 2023, owns 45 underlying wind farm assets (Appendix 1).

The Company's supplier base is made up of providers of management and financial services, such as brokers and registrar companies. We generally do not invest in the construction of wind farms and therefore do not generally interact with the suppliers of raw materials or turbine manufacturers.

#### **Policies**

The Greencoat UK Wind Group takes the risk of modern slavery in its value chains seriously. We implement necessary policies to identify the areas of potential concern. We use our understanding of modern slavery risks and our ESG Policy to make an informed decision about new acquisitions and about entering into new contracts with our suppliers. The full ESG Policy of the Company, and ESG Report, are available on the Company's website: <a href="https://www.greencoat-ukwind.com">www.greencoat-ukwind.com</a>.

Schroders Greencoat is a signatory to the Principles for Responsible Investment which apply throughout the Greencoat UK Wind Group's portfolio. These principles require the Greencoat UK Wind Group to make reasonable endeavours to procure the ongoing compliance of its portfolio companies with its policies on responsible investment.

Our **ESG Policy** commits us to implement responsible investment targets in the day to day running of our business. The Company relies on the Investment Manager to apply its ESG policies to any investment decision process.

The Investment Manager has set up an ESG Committee which comprises representation from each business managed by it, including for the Company. This ESG Committee has responsibility for coordinating and implementing the Investment Manager's ESG related strategy and initiatives. The committee monitors how the ESG strategy is implemented by the relevant business on a regular basis and reports to the Investment Manager's Risk Management Committee.

In the context of the current portfolio, all of the wholly owned investee companies are covered by our ESG Policy which requires compliance with applicable laws and regulations, including the UK Modern Slavery Act. Investee companies are also expected to work to ensure that the occurrence of modern slavery or human trafficking does not occur in their operations or supply chains. In terms of any new

asset due diligence, the areas under particular scrutiny are health & safety and environmental track record, community engagement, as well as financial crime including anti-bribery & corruption. Generally, the investee companies do not have employees and therefore there are no direct labour issues to monitor.

The Investment Manager operates a **Whistleblowing Policy** and implements necessary mechanisms to enable escalation of any concerns of malpractice.

Our **Anti-bribery and Corruption Policy** makes it clear that the Company is committed to conducting its business in an honest and ethical manner. The Company has a zero-tolerance approach to any form of bribery or corruption.

In accordance with our **Health and Safety Policy**, the Board oversees performance, reviewing quarterly reports which cover operational issues including health and safety and environmental issues, holding quarterly scheduled meetings and annual risk reviews. The health and safety standards of operational contractors are adequately monitored by the Investment Manager in line with its obligations to the SPVs under each relevant management services agreement.

# Due diligence process and steps taken to assess and manage slavery and human trafficking risk

#### **Due Diligence**

As part of the due diligence on any acquisition, the Investment Manager will analyse if there are any investment specific ESG considerations resulting from the nature of the investment, geographic location, community needs and environmental, biodiversity, air, noise or water pollution concerns. The assessment could include discussions with members of the local community or third party service providers, consultations with third party technical advisers and in-house knowledge. This assessment will be proportionate to the nature and extent of the anticipated risks.

#### **Employees**

Generally, wind assets are acquired through SPVs which do not have any employees. Third-party operators are engaged to provide operational support, maintenance and facilities management activities. Amongst other things, the content of any new contractual relationships is informed by the ESG and Health and Safety Policies.

#### Supply chains

We acknowledge, in line with the OECD Guidance for Institutional Investors, that as a parent company, the Company has a possibility to use its shareholding rights to encourage investee companies to comply with its ESG policies and relevant laws, including the UK Modern Slavery Act. We are not aware of any salient human rights issues in our supply chain and will undertake a project to work with our contractors to ensure there are appropriate controls in place to prevent this.

Where we enter into a new relationship with a third party on a material contract, we will conduct due diligence as to the business integrity of the third party. We will also conduct regular reviews of material service providers to our sites and aim to ensure that the contracts, where possible, reflect our stance in relation to ESG.

In line with the expectation set out in the OECD Guidance for Institutional Investors, the Company seeks to exert leverage over its investee companies to implement appropriate measures against potential human rights abuse. When we appoint a new third party operator, we conduct due diligence to assess their track record on relevant ESG topics, including, where appropriate, an assessment of their supply chain, environmental, and health and safety performance. We are committed to working with our third party operators to foster best practice on these issues and work closely with them to outline our expectations and requirements.

#### Effectiveness tracking

For the financial year 2023 we have identified the following KPIs:

Consolidation and progression of the Greencoat UK Wind Group modern slavery related ESG systems and processes to date, to that effect:

- review third party contractors' arrangements and work with them to seek to ensure that their working practices prevent human rights abuses and modern slavery; and
- ensuring investee companies implement ESG Policies, Health and Safety Policies, Anti Money Laundering and Corruption Policies and Conflict of Interest Policies.

### **Training**

The employees of the Investment Manager are provided with sufficient knowledge, training and tools to ensure they can effectively identify and manage ESG-related risks and opportunities within their management of the funds.

Greencoat UK Wind PLC Board of Directors approved this statement as at 31 March 2023.

**Shonaid Jemmett-Page** 

Chairman

(for and on behalf of the Board of Directors)

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## Appendix 1

Wind Farm		SPV Company	Wind Farm Ownership Stake
1.	Andershaw	Andershaw Wind Power Limited	100%
2.	Bicker Fen	Bicker Fen Windfarm Limited	80%
3.	Bin Mountain	Bin Mountain Windfarm (N.I.) Limited	100%
4.	Bishopthorpe	Bishopthorpe Wind Farm Limited	100%
5.	Braes of Doune	Braes of Doune Wind Farm (Scotland) Limited	100%
6.	Burbo Bank Extension	Hoylake Wind Limited	15.7%
7.	Brockaghboy	Brockaghboy Windfarm Ltd	100%
8.	Carcant	Carcant Windfarm (Scotland) Limited	100%
9.	Church Hill	Church Hill Wind Farm Limited	100%
10.	Clyde	Clyde Windfarm (Scotland) Limited	28.2%
11.	Corriegarth	Corriegarth Wind Energy Limited	100%
12.	Cotton Farm	Cotton Farm Wind Farm Limited	100%
13.	Crighshane	Crighshane Wind Farm Limited	100%
14.	Deeping St. Nicholas	Fenland Windfarms Limited	80%
15.	Douglas West	Douglas West Wind Farm Limited	100%
16.	Drone Hill	Drone Hill Wind Farm Limited	51.6%
17.	Dunmaglass	Greencoat Dunmaglass Holdco Limited	35.5%
18.	Earl's Hall Farm	Earl's Hall Farm Wind Farm Limited	100%
19.	Glass Moor	Fenland Windfarms Limited	80%
20.	Glen Kyllachy	Glen Kyllachy Wind Farm Limited	100%
21.	Hornsea 1	Hornsea 1 Limited	12.5%
22.	Humber Gateway	Greencoat Humber Limited	37.8%
23.	Kildrummy Enercon	Kildrummy Wind Farm Limited	100%
24.	Langhope Rig	Langhope Rig Wind Farm Limited	100%
25.	Lindhurst	ML Wind LLP	49%
26.	Little Cheyne Court	Little Cheyne Court Wind Farm Limited	41%
27.	Maerdy	Maerdy Windfarm Limited	100%
28.	Middlemoor	ML Wind LLP	49%
29.	North Hoyle	North Hoyle Wind Farm Limited	100%
	North Rhins	North Rhins Wind Farm Limited	51.6%
31.	Red House	Fenland Windfarms Limited	80%
32.	Red Tile	Fenland Windfarms Limited	80%
33.	Rhyl Flats	Rhyl Flats Wind Farm Limited	24.95%
34.	Screggagh	Screggagh Windfarm Limited	100%
35.	Sixpenny Wood	Sixpenny Wood Windfarm Limited	51.6%
36.	Slieve Divena	Slieve Divena Wind Farm limited	100%
37.	Slieve Divena II	Slieve Divena Wind Farm No. 2 Limited	100%
38.	Stronelairg	Greencoat Stronelairg Holdco Limited	35.5%
39.	•	Stroupster Caithness Wind Farm Limited	100%
40.	Tappaghan	Tappaghan Wind Farm (N.I.) Limited	100%
41.	Tom nan Clach	Nanclach Limited	75%
42.	Twentyshilling	Twentyshilling Limited	100%
43.	Walney	Greencoat Walney Holdco Limited	25.1%
44.	Windy Rig	Windy Rig Wind Farm Limited	100%
45.	Yelvertoft	Yelvertoft Wind Farm Limited	51.6%