

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 2025.

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 five 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 2025, owns 49 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 directly with the suppliers of raw materials or turbine manufacturers other than in the provision of spare parts and maintenance activities.

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, our ESG Policy and the Schroders Greencoat Supply Chain 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: www.greencoat-ukwind.com.

Schroders Greencoat is a signatory to the Principles for Responsible Investment ("PRI") 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. Each SPV Board is responsible for adopting the ESG Policy at establishment of the SPV and for ensuring the continued adherence of the SPV to the ESG Policy on an annual basis or when policy updates have been made.

In terms of any new asset due diligence, generally, the investee companies do not have employees and therefore there are no direct labour issues to monitor. Due diligence therefore focuses on an assessment of suppliers' policies and performance.

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. Screening is also carried out on key service providers, as part of due diligence, to ensure that they are not considered in violation of global norms¹.

Employees

The Company does not have any direct employees. Whilst the risk of modern slavery within the Investment Manager's direct business operations is deemed to be low because its employees and contracted staff work in roles that are office-based, the Investment Manager operates a **Whistleblowing Policy** and implements necessary mechanisms to enable escalation of any concerns of malpractice.

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 with third party operators is informed by the ESG and Health and Safety Policies. Due diligence is also carried out by the Schroders Greencoat Risk team on any new third-party provider (see Supply chains section).

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.

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, including checks by the Investment Manager's Risk team on their policies relating to modern slavery and diversity and inclusion and by the Investment Manager's Compliance regarding aspects such as financial crime, sanctions and anti-money laundering. 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 2024, the Investment Manager updated the Schroders Greencoat Supplier Code of Conduct ("**Supplier Code of Conduct**") to include more explicit expectations relating to modern slavery and traceability and responsible sourcing practices for goods or materials which may have been produced

¹ Schroders' definition of global norms considers widely recognised principles such as the United Nations Global Compact Principles ("UNGC"), in line with most of the financial services industry. The UNGC Principles include a commitment to supporting and respecting internationally proclaimed human rights and the elimination of all forms of forced and compulsory labour.

in or procured from conflict-affected regions or regions at higher risk of human rights abuses. When we enter into a new relationship with a third party, we expect them to sign up to the Supplier Code of Conduct, or demonstrate equivalent policies and commitments are already in place for their business. This policy requires annual attestation of ongoing adherence to the commitments set out within the Supplier Code of Conduct, as well as notification of any material breaches, to support the Company's monitoring of ongoing compliance.

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 2025 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. The Investment Manager carried out a dedicated modern slavery training in 2024 to ensure that the issue of modern slavery was understood by its employees, including how the Investment Manager's policies and processes to manage and mitigate this issue to the extent possible.

Greencoat UK Wind PLC Board of Directors approved this statement as at 31 March 2025.



Lucinda Riches

Chairman

(for and on behalf of the Board of Directors)

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. Dalquhandy	Dalquhandy Wind Farm Limited	60%
15. Deeping St. Nicholas	Fenland Windfarms Limited	80%
16. Douglas West	Douglas West Wind Farm Limited	60%
17. Drone Hill	Drone Hill Wind Farm Limited	51.6%
18. Dunmaglass	Greencoat Dunmaglass Holdco Limited	35.5%
19. Earl's Hall Farm	Earl's Hall Farm Wind Farm Limited	100%
20. Glass Moor	Fenland Windfarms Limited	80%
21. Glen Kyllachy	Glen Kyllachy Wind Farm Limited	100%
22. Hornsea 1	Hornsea 1 Limited	12.5%
23. Humber Gateway	Greencoat Humber Limited	37.8%
24. Kildrummy Enercon	Kildrummy Wind Farm Limited	100%
25. Kype Muir Extension	Kype Extension Wind Farm Limited	65.5%
26. Langhope Rig	Langhope Rig Wind Farm Limited	100%
27. Lindhurst	ML Wind LLP	49%
28. Little Cheyne Court	Little Cheyne Court Wind Farm Limited	41%
29. London Array	London Array Limited	25%
30. Maerdy	Maerdy Windfarm Limited	100%
31. Middlemoor	ML Wind LLP	49%
32. North Hoyle	North Hoyle Wind Farm Limited	100%
33. North Rhins	North Rhins Wind Farm Limited	51.6%
34. Red House	Fenland Windfarms Limited	80%
35. Red Tile	Fenland Windfarms Limited	80%
36. Rhyl Flats	Rhyl Flats Wind Farm Limited	24.95%
37. Screggagh	Screggagh Windfarm Limited	100%
38. Sixpenny Wood	Sixpenny Wood Windfarm Limited	51.6%
39. Slieve Divena	Slieve Divena Wind Farm limited	100%
40. Slieve Divena II	Slieve Divena Wind Farm No. 2 Limited	100%
41. South Kyle	South Kyle Wind Farm Limited	100%
42. Stronelaig	Greencoat Stronelaig Holdco Limited	35.5%
43. Stroupster	Stroupster Caithness Wind Farm Limited	100%
44. Tappaghan	Tappaghan Wind Farm (N.I.) Limited	100%
45. Tom nan Clach	Nanclach Limited	75%
46. Twentysilling	Twentysilling Limited	100%
47. Walney	Greencoat Walney Holdco Limited	25.1%

48. Windy Rig	Windy Rig Wind Farm Limited	100%
49. Yelvertoft	Yelvertoft Wind Farm Limited	51.6%