

## **GREENCOAT RENEWABLES PLC**

### **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This voluntary statement is made on behalf of Greencoat Renewables plc (**Company**) and constitutes our modern slavery and human trafficking statement as of the 7<sup>th</sup> May 2026.

This statement sets out how the Company incorporates its social, environmental and governance (**ESG**) agenda in accordance with the Company's ESG Policy, in particular, human rights including modern slavery and human trafficking issues in its own business and its supply chains.

#### **Our structure, business and supply chains**

Greencoat Renewables plc is an investor in euro-denominated renewable energy infrastructure assets. The Company has been listed on the Euronext Growth Market of Euronext Dublin, the AIM market of the London Stock Exchange since July 2017, and the Johannesburg Stock Exchange since June 2025. The Company aims to provide investors with a sustainable annual dividend that increases progressively whilst growing the capital value of its investment portfolio in the long run through reinvestment of excess cashflow and prudent use of portfolio leverage. The Board of Directors of the Company (the **Board**) comprises five independent non-executive directors. The Company has delegated the day-to-day management of its business, including ESG matters, to Schroders Greencoat LLP (**Schroders Greencoat or Investment Manager**).

The Company's supplier base is made up of service providers of management services, such as financial managers, operations managers, project managers, brokers, and registrar companies. We generally do not invest in the construction of renewable energy assets and therefore do not generally interact with the suppliers of raw materials.

#### **Policies in relation to slavery and human trafficking**

The Company takes the risk of modern slavery in its service providers and supply chains seriously. We use our understanding of modern slavery risks and our ESG Policy to make an informed decision about new acquisitions and about entering new contracts with material service providers and suppliers. The full ESG Policy of the Company, and ESG Report, are available on the Company's website: [www.greencoat-renewables.com](http://www.greencoat-renewables.com).

The Investment Manager, Schroders Greencoat LLP is a signatory to the Principles for Responsible Investment which apply throughout the Company's portfolio. These principles require the Company 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 practices in the day to day running of our business. The Company relies on the Investment Manager to apply the ESG policies to investment decision processes and the operational management of portfolio companies and underlying assets.

The Investment Manager has set up an ESG Committee which is chaired by a Senior Partner and comprises representation from each business area it manages, 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.

In the context of the current portfolio, all the wholly owned investee companies are covered by our ESG Policy which requires compliance with applicable laws and regulations. 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 through contractual obligations and engagement with service providers. In terms of the due diligence of any new renewable energy asset, 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, but where an investee company does have employees, we ensure fair pay, safe working conditions, and protection from harassment or bullying. Should the company engage in the construction of renewable energy assets, or in the replacement of significant components, additional due diligence may be carried out including in relation to forced labour.

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

The Investment Manager **Supply Chain Policy** makes a commitment to building a robust due diligence process in order to mitigate ESG risks in the supply chain.

Our **Anti-bribery and Corruption Policy** makes it clear that the Company is committed to conducting its business in a 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 and holding quarterly scheduled meetings. The health and safety standards of operational contractors are adequately monitored by the Investment Manager

## **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 factors resulting from the nature of the investment, geographic location, community needs, mapping of land rights and technology including potential risks of modern slavery associated with the operational activity or its supply chain. The assessment may include discussions with members of the local community or service providers, consultations with third party advisers and in-house knowledge. This assessment will be proportionate to the nature and extent of the anticipated risks.

### **Employees**

Generally, renewable energy assets are acquired through SPVs which do not have any employees. Third-party service providers and consultants are engaged to provide project management, financial management, operational support, maintenance, and facilities management activities. Amongst other things, the content of any new material contractual relationship 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 the potential to use its shareholding rights to encourage investee companies to comply with its ESG policies and relevant laws. The Company seeks to ensure that its SPVs are also aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

There have been no salient human rights issues highlighted in our material service providers or supply chain to date, however, we continue to undertake work with our material service providers and suppliers to ensure there are appropriate controls in place to prevent this. In line with the expectation set out in the guidelines and principles above, the Company seeks to exert leverage over its investee companies to implement appropriate measures against potential human rights abuse.

When we appoint a new material service provider or supplier, we conduct due diligence to assess their track record on relevant ESG factors, including, where appropriate, an assessment of their supply chain, environmental, and health and safety performance. We are committed to working with our material service providers to foster best practice on these issues and work closely with them to outline our expectations, requirements and their role in promoting responsible business. We will also include specific contractual obligations regarding modern slavery with material service providers, amongst other ESG related topics, or require them to sign up to the Investment Manager's Supplier Code of Conduct, or an equivalent.

### **Indigenous Peoples**

We engage with all local communities on a regular basis in line with our community engagement procedure. Our third party operating managers are responsible for the day to day communications and report to the Investment Manager on a monthly basis, who in turn report all material matters to the Board of the Company.

In line with our ESG Policy, we ensure that land and access rights are respected, and that projects are managed in accordance with planning permissions. Although the Company focuses on operational renewable energy assets, we are committed to the principle of free, prior, and informed consent as it relates to the indigenous peoples.

### **Risk assessment and management**

The Company has a risk management framework which incorporates ESG factors including the risk of modern slavery. This management of this framework is the responsibility of the Investment Manager and is reviewed on an annual basis. The risk register is discussed at each monthly meeting by the Investment Manager with updates provided to the Company as required.

The Investment Manager has an established Risk Management Committee that meets on a quarterly basis to discuss the risk framework of the Company and investee companies including processes for identifying, assessing, and managing ESG factors.

### **Effectiveness tracking**

In the financial year 2021, Modern Slavery was incorporated in our ESG Strategy and was reported upon in line with other ESG factors for the Company. Modern Slavery audits have been commissioned and successfully completed since 2022 on an annual basis across a sample of assets. All findings from these audits are addressed and the learnings received help to continuously improve our approach to Modern Slavery. The Company will also evolve its approach to take into account new markets and new technologies to help mitigate any potential risk to the portfolio. The Company will also ensure that investee companies implement the ESG Policies, Health and Safety Policies, Anti Money Laundering and Corruption Policies and Conflict of Interest Policies.

In 2025, the Manager rolled out an updated Supplier Code of Conduct and will monitor annual attestation towards it from all suppliers who adopted it or demonstrated equivalent policies and commitments are already in place for their business.

## **Training**

The employees of the Investment Manager are provided with training and tools to ensure they can identify and manage ESG-related risks and opportunities. Annual training on modern slavery specifically is carried out on an annual basis.

Greencoat Renewables plc Board of Directors approved this statement for the financial year end 31 December 2025 on 7 May 2026.

*Bernard Byrne*

Benard Byrne

Chairman

(for and on behalf of the Board of Directors)

7 May 2026