



GRANSOLAR GROUP MODERN SLAVERY STATEMENT



Title	Gransolar Group Modern Slavery Statement
Geographical Scope	Grupo Gransolar S.L. and its subsidiaries
Category	Declaration / Statement
Date of Approval	29/05/2024
Approved by	Board of Directors

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This statement addresses the period from January 1st, 2024, to December 31st, 2024, in compliance with the requirements of the United Kingdom Modern Slavery Act, the Australia Modern Slavery Act, and the US Business Supply Chain Transparency on Trafficking and Slavery Act.

Grupo Gransolar, S.L. (“Grupo Gransolar” or “Gransolar”) takes a consolidated, whole-of-group approach to ethical sourcing. As such, this statement addresses the actions taken not only by reporting entities, but all of Grupo Gransolar’s subsidiaries on a consolidated basis. The subsidiaries taken into consideration for the elaboration of this document are listed in the Reporting Entities title.

It describes the steps taken during 2023 and that will be taken by Grupo Gransolar and its subsidiaries (hereinafter, “Gransolar”, the “Group,” or “Gransolar Group”) during 2024, to mitigate the risk of modern slavery in the Group’s businesses and supply chain.

1. INTRODUCTION

The last financial year has been one of uncertainty, marked by the geopolitical instability originated in 2022, creating significant geopolitical, economic, and environmental challenges. The effort, dedication and teamwork of Grupo Gransolar, S.L. and all its subsidiaries has ensured the organisation's profitable and sustainable growth, contributing to the creation of shared value and economic and social growth of the communities in which Gransolar is present.

According to the International Labour Organization (ILO), the term modern slavery covers a set of legitimate concepts, counting constrained work, obligation bondage, and human trafficking. It is an umbrella term to allude to circumstances of misuse that a person cannot deny or take off since of dangers, savagery, constraint, double dealing, or mishandle of control.

This is Gransolar’s second statement, and it provides an overall view of the measures and actions taken by the Group in order to tackle any violations or beaches on Human Rights.

Gransolar and its subsidiaries have been long committed to the respect, promotion, and defence of human rights. Gransolar is committed to observing the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the ten principles of the United Nations Global Compact. Together, these principles help us identify and respond to potential human rights and modern slavery risks.

Furthermore, Gransolar has taken some steps to adapt to the newly approved European legislation, such as the Corporate Sustainability Reporting Directive, the Corporate Sustainability Due Diligence Directive, and the green claims Directive.

2. BUSINESS STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Gransolar and its group of companies make up a business group. The Group’s activities mainly consist of the manufacture of components for photovoltaic projects, and the design, construction, execution, and management of photovoltaic solar energy facilities.

Gransolar's activity is governed by the purpose and values that define us, guide our progress, and mark our actions at all stages of the projects. As a diversified organisation at the cutting edge of sustainable

photovoltaic solutions, we work to generate fairer, more balanced, and interconnected environments and societies.

Our activity is always governed by the values, principles and behavioural guidelines established in the Code of Conduct, which was updated most recently by the Board of Directors on 31 May 2023.

Furthermore, Gransolar has established several commitments to responsible conduct and practices, grouped as follows:

- Compliance with relevant law and internal regulations.
- Relations with employees, customers, and suppliers.
- Relations with authorities and public officials.
- Environmental commitment.

From a strategic point of view, in 2023 the Group completed a process of reorganisation by which the different companies have been reorganised into two divisions, called Services & Solutions and Product, in addition to the corporate department that provides services to both.

Services & Solutions business line is comprised of the sub-lines' project development, engineering and construction, O&M (operation and maintenance), Self-consumption activities through ISE Energía, and batteries, through Energy Storage Solutions (E22). At the end of 2023, a new division dedicated to the construction of lines and substations was created in Australia within the division. The Services & Solutions business line has 592 employees worldwide.

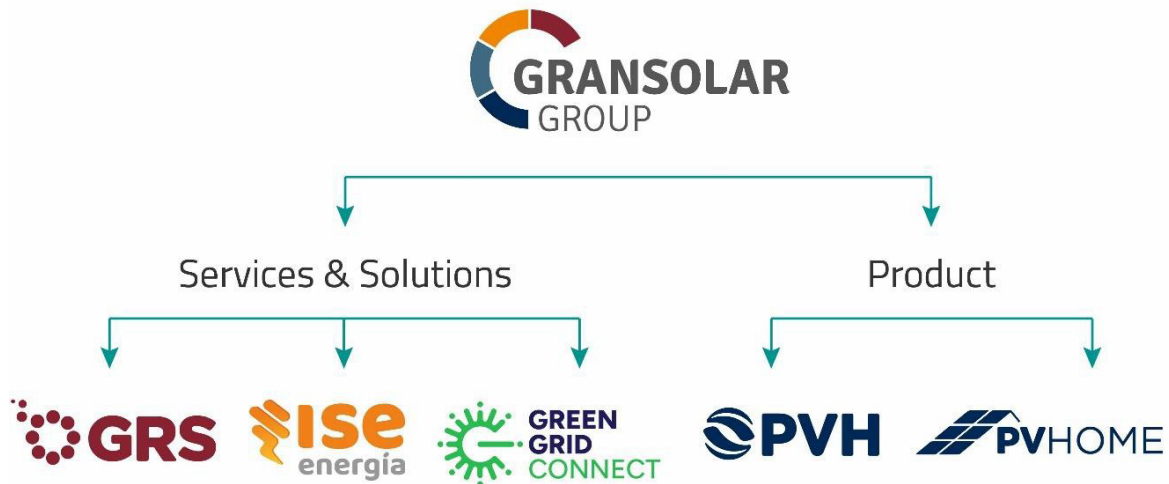
The Product division consists of: PV Hardware, PV Home and DeepTrack, meaning the design and manufacturing and supply of photovoltaic structures and trackers, self-consumption solution, controllers SCADA systems and trackers commissioning. This line has 1,016 employees worldwide.

2.1. Reporting Entities

This statement is provided by Grupo Gransolar S.L. (NIF B05397286) as a joint statement under the Modern Slavery Act. It covers Grupo Gransolar and the entities listed in Appendix 6.1.

This statement was developed in consultation with each of the reporting entities, throughout the country managers. The consultation process has been set in accordance with the requirements of section 14(2)(d)(ii) of the Modern Slavery Act, this statement was approved by the Board of Grupo Gransolar on May 29th, 2024, and is signed by Grupo Gransolar's, S.L. CEO.

2.2. Organization Chart



2.3. Supply Chain

Grupo Gransolar and all its subsidiaries share the same supply chain, with the special case of PV Hardware Solutions S.L. and its country branches. This is due to the specific raw materials needed by the factories around the world (Spain, US, and Saudi Arabia).

Grupo Gransolar supply chain within the project is involved in the planning, negotiation and procurement of goods and services for the Group, through the development of a methodology and strategy capable of administering and managing all the elements that are part of this process.

PVH establishes global agreements in order to guarantee the supply, quality requirements and competitiveness in order to be able to compete globally. The most important thing to understand is our value differential of manufacturing a great majority of the components that we use for the structure of the solar tracker in our plants in Cheste (Valencia-Spain), Jeddah (Saudi Arabia) and soon Houston (Texas-USA), therefore, a great volume of purchase is focused on raw materials in European, Asian and soon North American and Indian suppliers will be part of our supply structure. For more information about our suppliers and the goods we are provided, please refer to the Appendix section.

Our current Procurement Policy applies to all the companies that make up the Gransolar Group, as well as the subsidiary companies over which the Gransolar Group has effective control. Furthermore, the Procurement Policy is certified under ISO 20400 international standard.

This policy contemplates the way to work with our suppliers, and how we can homologate and evaluate them, mainly those that are considered, with a big volume as a whole account, or critical due to the quality of the supply. We evaluate them according to different control ratios including sustainability ones.

As an upgrade in our system, mid 2023 we started with the automatization of the homologation process. For this reason, we started using Achilles, a third-party tool that allows us to exercise more homologations in a smaller period of time. Moreover, Achilles has allowed us to set different areas of focus for each supplier and focus our attention on the critical areas or topics, such as environmental, social (including modern slavery practices), governance, health and safety, financial, legal and criminal, privacy, and cybersecurity risks.

In the same way, we have the Code of Conduct for suppliers, which establishes the criteria that must be assumed by any supplier when carrying out their professional duties. The purpose is to ensure and promote that the conduct is professional, ethical, and responsible in business activities in all parts of the world, in line with culture of the Group.

In case of breaches of the code, where we can monitor and supervise the process, apart from the legal, criminal, or administrative consequences that the action may entail, it may also have consequences on the supplier's contractual relationship, including disqualification as supplier.

As of December 31st, 2023, For the main development and construction equipment, the assessment exercise was carried out on 16 suppliers, with the result of 3 being non-approved and 1 pending corrective actions; 10 other suppliers were accredited, with only 1 not approved. In the product part, the assessment exercise was carried out on 18 suppliers, with the result of 2 non-approved suppliers; in addition, 29 other suppliers were accredited.

Finally, during 2023, Gransolar created a Human Rights Clause covering the topics related to the main risks of our sector's supply chain, such as labour rights, including all information related to modern slavery. The clause is being applied to different project contracts in the last year.

The clause is currently under revision, as the ESG Committee mandate is to annually actualize it. For the following years, we are expecting to cover all of our contracts with the Human Rights Clause.

3. GOVERNANCE, ACCOUNTABILITY AND DUE DILIGENCE

3.1. *Code Of Conduct and Ethics*

Our activity is always governed by the values, principles and behavioural guidelines established in the Code of Conduct, which was approved and updated most recently by the Board of Directors on 31 May 2023. Gransolar's Code of Conduct determines as a fundamental principle the promotion and defence of human and labour rights.

This principle is developed in the CSR Policy and the Human Rights Regulation. Among the measures included in these documents are the elimination of all forms of child and forced and/or bonded labour, the development of a due diligence procedure, a system for the prevention of resulting risks and a system to remedy and redress violations of the principles.

Gransolar is committed to conducting business in an ethical and lawful manner. Our Code of Conduct apply on a corporate level to all subsidiaries and country branches. It underpins the standards of behaviour expected from all our employees worldwide. It provides a clear set of standards for the way business is conducted, as well as ethical and behavioural guidance to help our people put the principles into action in their day-to-day work. Our Code makes it clear that our people also have a responsibility to report any behaviour which is inconsistent with the principles set out in the Code.

In parallel, Gransolar has a Supplier Code of Conduct, revised, and updated on 4 December 2023, in which we have updated the responsibilities of all the stakeholders in our supply chain with respect to social, environmental, and good governance matters.

Together with the Supplier Code of Conduct, the CSR Policy, and its dependent regulations (Human Rights Regulation and Community Investment Regulation) and the Criminal Compliance Model, establish the basic ethical values and principles that must govern the actions of Gransolar, its employees and all its stakeholders.

All these documents and corporate rules aim to ensure compliance with the Group's governance principles, with the ultimate goal of ensuring integrity throughout our organisation. Everyone who may be affected by these regulations is therefore required to behave in an honest, upright manner; which includes prohibiting workers, contractors, or suppliers from offering any kind of financial benefit to any public official under any pretext or circumstances.

Some other measures established under the Code are that no Gransolar employee may directly or indirectly offer, grant, request or accept gifts, handouts, favours, or compensation of any kind to or from any authority or public official.

In order to guarantee these provisions, Gransolar set up a Whistleblowing Channel, which is open and available to all our stakeholders. The aim is to provide a secure, anonymous, and protective channel to raise any concerns, suspicions or complaints related to attitudes or behaviours that are unethical, contrary to corporate codes and standards, or even illegal.

Gransolar's Corporate Legal Counsel Department is not aware of any cases of corruption, money laundering or bribery related to public authorities, government, political parties and/or representatives, whether monetary or in kind, involving the organisation either directly or indirectly. Furthermore, no legal proceedings have been filed related to unfair competition, antitrust practices, or activity against free competition.

Any breach of the Code of Conduct is taken very seriously. For employees, this can result in disciplinary action, up to and including summary dismissal, regardless of any criminal or civil responsibility derived. For equity partners, this can result in disciplinary action being taken in and partner-specific disciplinary process.

3.2. *Our Principles and Policies*

Through our policies we communicate our values and expectations, setting a high bar for ourselves and our partners and making clear that we do not tolerate modern slavery. We are committed to consistently evolving and improving our approach. We regularly review our policies to identify areas for update and improvement.

Gransolar is committed to ensuring the people and communities that support our business are treated with fundamental dignity and respect. These values have been long held at Gransolar and demonstrates our support for fundamental human rights and the dignity of workers everywhere we operate around the world. We strive to ensure the products and services we provide are produced in a way that respects internationally recognized human rights, including the right to freely chosen employment. We do not tolerate the use of child labour, forced labour, or human trafficking in any form in our operations or value chain, including slave labour, prison labour, indentured servitude, or bonded labour. Our commitment and approach are informed by leading international standards and frameworks developed by the United Nations (UN) and ILO. Gransolar is committed to respecting and supporting the UN Guiding Principles on Business and Human Rights, UN Universal Declaration of Human Rights, Core Conventions of the ILO, and ILO Declaration on Fundamental Principles and Rights at Work.

Depending on the type of services we contract, Gransolar requires different sets of conditions:

- In case of suppliers for the development and construction of photovoltaic solar farms, Gransolar requires all significant new suppliers (main suppliers) to sign the "Code of Conduct for Suppliers". The objective of this code is to ensure and promote professional, ethical, and responsible conduct by all

Gransolar Companies' suppliers during the undertaking of their activities anywhere in the world, in line with the ethical business culture established in Gransolar. Among the commitments entered into by both parties, we highlight the following:

- Application of the regulations and good practices in terms of employment conditions, workplace health and safety and in their relations with their employees in accordance with the principles of respect, dignity, and fairness, considering the different cultural sensitivities of each individual, and not tolerating any form of violence, bullying or abuse at work, or discrimination of any kind.
- Our commitment to the environment is a priority objective in Gransolar's social responsibility. This code obliges companies to commit to strict compliance with international, national, regional, and local legislation, as well as complying with the principles defined by Gransolar.
- When contracting suppliers of parts or raw materials for component development, Gransolar requires the supplier to sign an environmental commitment in which it states compliance with environmental regulations, correct waste management and acceptance of emergency plans or compliance with its own environmental emergency plans. As stated previously, our suppliers are assessed on completion of their work, and this assessment includes environmental matters through certificates.
- For general services contracting, in most cases for the Gransolar Corporate offices, and since the amounts are relatively insignificant, Gransolar considers suitability criteria and not necessarily environmental or social factors. Despite this, Gransolar has also procured goods and services based on social criteria, such as the purchase of water from the company Auara, a social, sustainable bottled water company.
- In order to encourage the procurement of local goods, Gransolar cooperates with Amazon Business Prime to give priority to local trade.
- Finally, in regard to the contracting of services, Gransolar fosters an internal culture that gives priority to subcontracting local services in the countries where our projects are being carried out, thus promoting local job creation despite the fact that this has not been formalised in a specific procedure. These subcontractors are required to sign a document in which special emphasis is placed on the health and safety of their workers in addition to complying with all environmental regulations. These documents are specific for each country in order to adapt to and comply with applicable local legislation.

3.3. *Due Diligence, Grievance, and Remediation*

In their relations with their employees, all suppliers must act in accordance with the principles of respect, dignity, and justice, taking into account the different cultural sensitivities of each individual, and not permitting any form of violence, harassment or abuse at work, or discrimination on the grounds of race, religion, age, nationality, gender or any other personal or social condition unrelated to their merits and capabilities. Special attention is focused on the labour integration of disabled persons, and those belonging to any ethnic, religious, or other minorities.

A new whistleblowing channel was set up at the end of 2022 in order to comply with the obligations arising from EU Directive 2019/1937 and Spanish Law 2/2023 on the protection of persons who report breaches of Union Law. All the information on our whistleblowing channel can be found via the following link: <https://gransolar.integrityline.com/frontpage>.

At Gransolar, we encourage all our stakeholders to report any suspicious unethical, illegal, fraudulent, or undesirable conduct within our operations and supply chain. We include in this conducts any suspected modern slavery and child labour, as well as any other negative impacts on people, communities, and environment. In 2023 there were no confirmed reports of violations of human rights or discrimination, following the investigations into possible cases reported through the various whistleblowing channels.

As regards promoting the principles of the ILO (International Labour Organization), Gransolar hereby states its commitment to respecting the freedom of association and the right to collective bargaining through its collective agreements. Furthermore, Gransolar endorses all the treaties, conventions and agreements internationally recognised by the various social agents in the field of human rights.

We engage in robust due diligence with our suppliers. We recognize the challenges Suppliers face when working to meet our Supply Chain Standards and work closely with them to ensure best practices. We prioritize mechanisms that drive continuous evaluations and improvement and are committed to working with our Suppliers to remedy identified issues and put systems in place to prevent issues in the future. Our Supplier's Code of Conduct and the Purchasing Policy provides an overview of our due diligence processes.

We have established grievance mechanisms to enable the identification of modern slavery and other human rights harms and facilitate their appropriate remediation. These mechanisms are open to all affected persons and communities, including our own employees, contractors, suppliers, workers in Gransolar's supply chain and community members.

Due to the recently transposed EU Directive 2019/1937, into the Spanish Law 2/2023 relating to the protection of persons who report breaches of Union law, Gransolar updated its Whistleblowing Channel, approving a Policy and specific Procedure related to the Internal Information Systems, upgrading our standards on anonymity, confidentiality, and document handling.

4. RISK IDENTIFICATION AND ASSESSMENT

Gransolar is conscious of the importance of addressing any potential modern slavery risk within our organization and operations. We implemented a monitoring and controlling system to avoid any risk or hazard in the development of our activity. As an EPC company, we rely and firmly depend on our supply chain. Gransolar undertakes an annual assessment related to risk, as part of our Action Plan 2022-2025. This risk identification is based on a classification depending on the area the impact the most:

- **Economical and Financial Risks:** Risks that may have an impact on the economic and financial structures of the organization, such as cash flow, benefits, trading, earnings, funds, etc.
- **Timescale Risks:** Risks that may have an impact on the timeframes or milestones established for projects.
- **Quality Risks:** Risks that may have an impact on the quality of our performance, including product manufacturing, human resources, allocation of resources, and the adequacy or inadequacy of those.
- **Third-party related Risks:** Risks that may have an impact on our relationships with clients, partners, and suppliers.
- **CSR/ESG and Reputational Risks:** Risks that may have an impact on the Environmental, Social and Corporate Governance aspects of the organization, damaging the reputation or image of Gransolar.

All identified risks are classified based on their level of criticality and possibility of occurrence. The risk identified as our most critical is our dependence on China for our supply chain. Supply chains based on electronic devices or metal structures are very dependent on China. This is due to the large amount of natural resources, such as minerals, China has. This, along with the fact of a cheap workforce and the

lower standards on human and labour rights, place China above the rest of geographical markets for competitiveness.

Being conscious of this matter, Gransolar put in place a monitoring and control system over our suppliers, in order to avoid any modern slavery practice. In this order, the Board of Directors revised and approved a Policy of Procurement, considering the requirements for the certification ISO 20400 related to sustainable purchases. This policy lays out different processes of homologation and evaluation of suppliers, taking into consideration, not only environmental requirements, but social too. These requirements underline the importance of the abiding to Gransolar's Code of Conduct and our Supplier's Code of Conduct in which child labour and other practices are prohibited.

Furthermore, with the implementation of the Suppliers' Management tool, Achilles, risks are now being monitored individually and periodically. Our commitment to equality, inclusion and diversity is present throughout the supplier identification and selection process, promoting equal access to opportunities by mitigating human rights risks for all employees and workers.

5. EFFECTIVENESS & FURTHER STEPS

As already stated in this document, Gransolar has a robust due diligence process in place, which allows us not only to identify and mitigate present and future potential risks, but to intervene and remediate the risks that materialize.

As of the end of 2023, we registered 12 complaints and allegations of different matters in our Whistleblowing Channel. All 12 complaints were analysed, studied, and concluded as not a non-compliance. As of the end of April 2024, we have registered 5 complaints and allegations, all related between them and were ruled as a non-compliance too. We consider these figures as a good indicator of our performance, taking into consideration the whistleblowing channel is opened to all our groups of interest.

Regarding our suppliers and subcontractors, homologations and evaluations were taken by Gransolar's Approved Suppliers List (ASL). The ASL represents the critical suppliers for both business lines, regarding the volume of purchases and/or the criticality of them. During the evaluation and homologation processes, 6 new suppliers were included in the non-approved list and 1 supplier is pending on corrective measures.

For late 2024 and 2025, Gransolar is committed to improving its Suppliers Management System, throughout the continuous revision and actualization process. Moreover, the most recent Board of Directors approved a modification of the Procurement Policy in order to put in place additional requirements for all suppliers and subcontractors. These requirements cover topics such as accident rates and H&S, Diversity and Inclusion, and Modern Slavery practices. All these requirements must be covered by all suppliers during the evaluation and homologation process.

6. CONSULTATION

6.1 Statement development

The development of this statement was led by our Corporate Social Responsibility team, which consulted directly with key functions across the group to draft the statement. The draft of the statement was reviewed by the Corporate Social Responsibility Department and approved by the Board of Directors. As the US and UK legislation states, the statement is accessible in Gransolar's corporate webpage (www.gransolar.com) and publicly registered in the Australian Border Force.

6.2 Consultation with reporting entities

This statement was reviewed and approved by the Board of the organization with decision-making power over the reporting entities. This consultation process included direct meetings to discuss their modern slavery reporting and underlying risk management.

6.3 Additional consultation, including with owned and controlled entities.

In addition to the specific consultation with reporting entities outlined above, this statement was developed through an extensive cross-functional consultation process which encompassed engagement with Directors of owned and controlled entities.

7. APPENDIXES

7.1. Reporting Entities

COMPANY	ACTIVITY	LOCATION	ID NUMBER
Deeptrack, S.L.U.	R&D&I	SPAIN	B85693224
Energy Storage Solutions, S.L.U.	-	SPAIN	B87821880
Gransolar Construcción de Proyectos, S.L.U.	Construction	SPAIN	B87038394
Gransolar Desarrollo de Proyectos, S.L.U.	Project development	SPAIN	B76585827
Gransolar Investment, S.L.U.	Project development	SPAIN	B87454559
Gransolar OYM, S.L.U.	O&M	SPAIN	B87038345
Grupo Gransolar, S.L.	Corporate Services	SPAIN	B05397286
ISE Energía, S.L.U.	Engineering and Self-Consumption	SPAIN	B02441418
PV Hardware Solutions, S.L.U.	Manufacturing and Installation	SPAIN	B02467777
PV Hardware Home, S.L.U.	Engineering and Self-Consumption	SPAIN	B13810684
Construcción De Proyectos PGRS, Lda	Construction	PORTUGAL	516143263
Gransolar Construction Australia Pty Ltd	Construction	ASUTRALIA	640 607 209
GRS Construccion Chile, SpA	Project Development	CHILE	77.190.847-0
Gransolar Desarrollo Y Construccion Mexico, S.A. De C.V.	Construction	MÉXICO	CME160413H26
Gransolar Development & Construction South Africa (Pty) Ltd	Construction and Project Develop.	SOUTH AFRICA	4100296070
Greefspan II OM (Pty) Ltd	O&M	SOUTH AFRICA	2018 / 266951 / 07
GRS Construction USA, Llc	Construction	USA	99-0362427
Gransolar Construcción de Proyectos, S.L. (Dubai Branch)	Construction	UAE	Ind. Lic. 775071
Grupo Gransolar Holding Chile, SpA	-	CHILE	77.038.604-7
Gransolar Sviluppo di Progetti, S.R.L	Construction	ITALIA	14808571005
Jasper OM (Pty) Ltd	Maintenance	SOUTH AFRICA	2019 / 537523 / 07
Lesedi OM (Pty) Ltd	Maintenance	SOUTH AFRICA	2020/172392/07
Letsatsi OM (Pty) Ltd	Maintenance	SOUTH AFRICA	2020/172415/07
PV Hardware LLC	Manufacturing and Installation	USA	45-1803481
PV Hardware Middle East Ltd	Manufacturing	KINGDOM OF SAUDI ARABIA	CR4030400685
PV Hardware Solutions SL (Dubai Branch)	Installation	UAE	Ind. Lic. 776409
PV Hardware South Africa (Pty) Ltd	Installation	SOUTH AFRICA	9738248187
PV Hardware Turkey Donanim Teçhizat Ticaret Anonim Şirketi	Installation	TURKEY	7330889187
Planchar Hadware Solutions Private Limited	Project development	INDIA	U40200KA2021FTC156145
Gransolar Construction UK Limited	Construction and Project Develop.	UK	337 2154 15
PV Hardware Brasil Ltda	Installation	Brazil	50.763.649/0001-32
Gransolar Development Romania S.R.	Project development	ROMANIA	47556232
Gransolar do Brasil Construção Ltda.	Construction	BRAZIL	22.471.366/0001-81
GreenGrid Connect Pty Ltd	Construction and Interconnection	AUSTRALIA	646 007 436

7.2. United Kingdom Modern Slavery Act 2015 Criteria

Criteria	Definition	Section
Criterion 1	Identify the reporting entity or entities.	2.1
Criterion 2	Take action to identify, prevent and mitigate modern slavery in your operations and supply chains.	2.3 / 4
Criterion 3	Describe the organization and supply chain structure.	2 / 2.3
Criterion 4	Describe the Corporate Policies on modern slavery and human trafficking.	3.2 / 3.3
Criterion 5	Describe the actions taken by the reporting entity to identify, assess and address the risks.	4.
Criterion 6	Describe Actions taken to prevent modern slavery (and measurement against performance indicators, if relevant).	3.2 / 3.3 / 4
Criterion 7	Group statements will need to identify every entity within the remit of the UK Act, or within the remit of the Group.	2.1

7.3. Australian Modern Slavery Act 2018 Criteria

Criteria	Definition	Section
Criterion 1	Identify the reporting entity or entities.	2.1
Criterion 2	Describe the reporting entity’s structure, operations, and supply chains.	2.1 / 2.2 / 2.3
Criterion 3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4
Criterion 4	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes.	3.2 / 3.3 / 4
Criterion 5	Describe how the reporting entity assesses the effectiveness of these actions.	3.3
Criterion 6	Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	5
Criterion 7	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	4 / 5

7.4. US Business Supply Chain Transparency on Trafficking and Slavery Act of 2020 Criteria

Criteria	Definition	Section
Criterion 1	Identify the reporting entity or entities	2.1
Criterion 2	Include a disclosure whether the reporting entities have taken any measures during the year for which such reporting is required to identify and address conditions of forced labor, slavery, human trafficking, and the worst forms of child labor within the covered issuer's supply chain.	2.3 / 3.1 / 3.2 / 3.3
Criterion 3	Include a 'Policies to Address Forced Labor, Slavery, Human Trafficking, and the Worst Forms of Child Labor' section, including information describing to what extent.	3.2
Criterion 4	Grievance and remediation process	3.3
Criterion 5	Public disclosure of the statement on the Commission's website.	5.1

7.5. Supply Chain details

Gransolar Holdings S.L. Supply Chain and providers details.

Region	Suppliers
Australian Projects	-PV Modules: China -Inverters: Europe
European Projects	- PV Modules: China -Inverters: China / Europe
North American Projects	- PV Modules: China -Inverters: Europe / China

PV Hardware Solutions S.L. Supply Chain and providers details.

Region	Suppliers
Australian Projects	-Metal Structures: China & Aus -Electronic: China -Plastic: Spain -Fasteners: China -Motors & Slew Drives: China
European Projects	-Metal Structures: Spain, India & China -Electronic: China -Plastic: Spain & Germany -Fasteners: Spain & China -Motors & Slew Drives: China
North American Projects	-Metal Structures: Spain & US -Electronic: China -Plastic: Spain & US -Fasteners: Spain & US -Motors & Slew Drives: China & México
South American Projects	-Metal Structures: Spain & US -Electronic: China -Plastic: Spain & US -Fasteners: Spain & US -Motors & Slew Drives: China & México
South African Projects	-Metal Structures: South Africa -Electronic: China -Plastic: Spain -Fasteners: South Africa -Motors & Slew Drives: China
Middle East Projects	-Metal Structures: Saudi Arabia -Electronic: China -Plastic: Spain -Fasteners: Spain & China -Motors & Slew Drives: China
Indian Projects	-Metal Structures: India -Electronic: China -Plastic: Spain -Fasteners: China & India -Motors & Slew Drives: China

The Board of Directors of Grupo Gransolar, S.L. on May 29th, 2024, and in compliance with the requirements established in the 2015 United Kingdom Modern Slavery Act, 2018 Australian Modern Slavery Act, and 2020 US Business Supply Chain Transparency on Trafficking and Slavery Act, proceeds to formulate the Modern Slavery Statement, related to the period from January 1st to December 31st, 2024, as well as from January 1st to December 31st, 2023 in a referenced manner.

The aforementioned Modern Slavery Statement is signed below by the CEO of Grupo Gransolar, S.L., on behalf of the Board of Directors, and endorsed by the Deputy Secretary of the Board on all pages.

A handwritten signature in black ink, appearing to read 'Iván Ernesto Higuera Rivas', written over a rectangular stamp area.

D. Iván Ernesto Higuera Rivas
CEO Grupo Gransolar, S.L



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