

BNZ 2022 Report Powering Europe to a greener future

Modern Slavery Statement



Modern slavery statement

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1. About BNZ

BNZ is an independent renewable energy power producer, with strong local expertise in Europe. The company is part of the portfolio under management by Glennmont Partners from Nuveen, one of Europe's largest renewable energy fund managers.

BNZ is managing the whole lifecycle of its plants from securing land and grid connections, through construction and continuing into operation. We have strong proven expertise and strive to work closely with local communities through development and into operations. Our professional team actively develops and manages a diverse pipeline of projects spread across Italy, Portugal and Spain.

2. Introduction

This voluntary statement is made on behalf of BNZ pursuant to section 54 of the Modern Slavery Act 2015. This statement contains details of the steps that BNZ takes to ensure that neither slavery not human trafficking take place in the business or supply chains of BNZ.

According to the Modern Slavery Act 2015, the following definitions are encompassed within the term 'modern slavery':

• 'Slavery' is where ownership is exercised over a person

• 'Servitude' involves the obligation to provide services imposed by coercion

• 'Forced or compulsory labor' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily

• 'Human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them

Modern slavery is an international crime and transcends age, gender and ethnicity. BNZ is opposed to all forms of Modern Slavery and acts in accordance with its core values while taking into account internationally recognized principles for environmental protection, human and labor rights, business ethics and anti-corruption. This includes improving business practices and investment monitoring to combat Modern Slavery.

3. Policies and

Practices

BNZ recognizes both the business imperative and moral obligation to carry out its business activities in a socially responsible and environmentally sustainable manner, with due consideration given to human rights. Our policies and documents have been formalized to demonstrate our commitment to this. These documents include:

- BNZ ESG policy
- BNZ Social policy
- Self-Certification document

These policies set out the social, ethical and environmental standards that we use internally to make decisions and also sets out the commitments that BNZ suppliers are expected to adhere to. These polices reference human rights, fair labor and anticorruption.

BNZ self-certification document, to which every supplier must adhere, defines our company's values and guiding principles. They include a commitment to conduct business ethically as well as compliance with all laws, rules and regulations in the places/countries where BNZ does business. These guiding principles are embedded in everything the company does. BNZ believes in partnering with others who share its values and who understand the importance of always conducting business ethically.

In relation to our employees, BNZ aim is to attract and retain professionals who share a commitment to our values. In the unlikely event that misconduct uncovers, including concerns around modern slavery, employees would be encouraged to report the misconduct to senior management. Additionally, BNZ policies provides guidance to employees on how to raise concerns.

4. Risk and supply chain

assessment

BNZ is assessing its business for the potential risk of modern slavery and conclude that the two main areas where modern slavery could, theoretically, occur are within BNZ own workforce and in the workforce of our supply chain. However, we consider that BNZ has adopted robust employment practices for recruitment and management of our own staff. Accordingly, we believe that the risk of modern slavery is more likely within our supply chain than within our own workforce.

BNZ is committed to engaging ethical suppliers that provide high quality products and services. As a minimum, we expect both ourselves and our suppliers to comply with all applicable local laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically and being environmentally responsible where practical.

BNZ communicates to its suppliers the importance of the commitment to fair treatment of laborers, but also a commitment to permit transparent investigation regarding the origin of materials and the working conditions of employees.

BNZ's contract terms and the self-certification document with all of its suppliers, reaffirm BNZ's commitment to zero tolerance for forced labor from any of our upstream suppliers.

5. Training

BNZ believes that the training of people is an effective way to raise awareness of the issues around modern slavery. We make our self-certification document, ESG Policy and Social Policy available on the staff intranet and update these annually. BNZ is working to build recognition of ethical sourcing issues among employees, particularly those responsible for overseeing its modern slavery due diligence as well as buyers of services.

Moreover, BNZ will provide mandatory training on Modern Slavery to all employees in 2023 and plans to hold training each year going forward. As part of this training, employees are required to explicitly acknowledge that they understand their responsibilities with respect to compliance with all governing laws and regulations, as well as operating in a manner consistent with the ethical principles that govern BNZ and its subsidiaries.

6. Our commitment

BNZ business is built upon a culture of robustness and performance, which is underpinned by an individual and collective commitment to maintain the highest ethical standards at all times. BNZ commits to not using child labor and forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor and does not tolerate slavery in any of its business or supply chains.

BNZ committed to the development, construction and operation of renewable energy power production at scale. The Board of Directors has oversight of the Modern Slavery and Human Trafficking statement development, implementation and enforcement.





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