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Modern Slavery and Human Trafficking Statement

The Renewables Infrastructure Group Limited (“TRIG” or “the Company”) is a long-term investor in renewables infrastructure across the UK and the European Union. TRIG manages its affairs primarily through its Investment Manager, InfraRed Capital Partners Limited (“InfraRed”), and its Operations Manager, Renewable Energy Systems Limited (“RES”) (together “the Managers”), who are together responsible for assessing and managing the risks to TRIG and its stakeholders related to sustainability matters, including modern slavery and human trafficking.

Commitment

TRIG has a zero-tolerance approach to modern slavery in all its forms. The Board of the Company and its Managers are not aware of modern slavery taking place in connection with the Company’s direct business operations (i.e. those suppliers that contract directly with TRIG). In addition, the Managers have adopted a risk-based approach to understanding and managing modern slavery or wider human rights risks within its wider supply chain (i.e. in relation to the Company’s portfolio).

This document outlines TRIG’s commitment to compliance with the UK Modern Slavery Act and combatting modern slavery and human trafficking in its supply chains.

In March 2025, the UK Home Office updated its ‘Transparency in Supply Chains’ statutory guidance, placing greater emphasis on continuous improvement, meaningful disclosure and transparency about identified risks and cases. The Board and the Managers have considered the guidance in their review of TRIG’s approach and recognise that it is broadly aligned with the key recommendations. Key areas of focus for the Company during the year included strengthening supply chain mapping beyond Tier 1 (where feasible) and understanding salient risks to workers.

TRIG’s strategy and purpose

TRIG is a closed-ended investment company which invests in renewable energy infrastructure and related technologies, with a diversified portfolio predominantly consisting of wind farms and solar PV projects across Europe (including the UK).

TRIG’s purpose is to create shareholder value from a portfolio of renewable energy generation and supporting infrastructure, contributing towards a cleaner and more secure future. This approach is underpinned by the Company’s sustainability objectives, which are to:

**Mitigate adverse
climate change**

**Preserve our natural
environment**

**Positively impact the
communities we
work in**

**Maintain ethics and
integrity in
governance**

Structure and supply chain

TRIG's investment portfolio is diversified across technologies (currently invested in onshore and offshore wind, solar PV, and battery storage) and geographies (currently invested in UK, France, Germany, Sweden and Spain).¹

As is typical for an investment company, TRIG does not directly employ staff. The application of the Modern Slavery Act is most relevant to the companies in TRIG's supply chains. The Board and Managers recognise the Company's responsibilities to society in relation to TRIG's supply chain.

Depending on the project phase, TRIG's supply chain exposure varies. For projects in the development or construction phase, exposure will depend on the type of agreements in place at acquisition, whereas for operational projects, suppliers tend to be pre-existing at the point of acquisition, with TRIG typically only selecting new or replacement suppliers as contracts expire. The table below references some of the direct subcontractors TRIG has exposure to:

Supplier	Development & Construction (incl. repowering)	Operational
EPC contractors	✓	
Original Equipment Manufacturers ("OEMs") (as turbine and panel suppliers)	✓	
Owners Engineer / Asset Manager	✓	✓
Balance of plant contractors	✓	✓
Utilities	Including site-specific services e.g. Meter Readings, Waste Management	
Original Equipment Manufacturers ("OEMs") (as O&M Provider)		✓
Independent Service Providers ("ISPs") (site managers, security & monitoring)		✓
Other spares, repairs and service providers		✓

It is acknowledged that, whilst useful for providing some understanding of the Company's supply chain risk profile, focusing on tier 1 suppliers² does not always reflect the full supply chain of its investment activity. There is often a wider supply chain beyond TRIG's tier 1 suppliers with whom the Company does not have direct relationship or visibility of. In order to assess the risk of modern slavery occurring beyond tier 1 of TRIG's suppliers, the Investment Manager conducts due diligence as outlined below, focused on salient risks.

Due diligence processes and risk assessment

Prior to investment, InfraRed takes primary responsibility for assessing TRIG's sustainability risk exposure including modern slavery and human trafficking for new investments. InfraRed maintains an Exclusion Policy, a negative screen outlining activities that it will not support (on behalf of TRIG). These include activities pertinent to this Statement such as breaches of fundamental human rights and business ethics and compliance.

¹ A full list of investments in TRIG's portfolio can be found on the Company's website: <https://www.trig-ltd.com/portfolio/>

² Tier 1 suppliers are those that directly supply TRIG's portfolio companies.

InfraRed considers frameworks such as the UN Guiding Principles on Business and Human Rights and United Nations Global Compact (UNGC). The UNGC's ten principles cover *inter alia* human rights, labour rights and the fight against corruption.³

InfraRed's processes require an early assessment of any sustainability-related 'red flags' before proceeding to the next stage of the investment process and conducting detailed due diligence. The table below outlines the due diligence steps which would be completed, considering the risk involved and subject to 'red flags' identified and the project phase.

Step	Pre-Construction	During Construction / Operational Phase
Assess locations of supply chain to ascertain whether there is a presence in high-risk regions	Yes	Yes, for lifecycle
Broaden scope / enhanced due diligence if concerns arise	Yes	Yes
Review suppliers' codes of conduct, sustainability and human rights policies	Yes	Yes
Assess operationalisation of policies via reviewing reports, third party research, evidence of audits, etc.	Yes	Yes
Consider alternative suppliers from non-high-risk regions if risks identified	Yes	Yes, for lifecycle
Update understanding of best practice and government policy developments; review relevant legislation; and ensure application to due diligence process	Yes	Yes
Contractual agreement from suppliers to uphold high standard of business conduct, respect for human rights and refrain from engaging with businesses that are the target of sanctions	Yes	Yes, for lifecycle; and consider risk if installed components come from parties currently / previously on sanctions lists
Consider the need for on-the-ground audit and component traceability, throughout manufacture and up to point of shipping where achievable, to verify practical implementation of codes of conduct and the provenance of key materials	Yes	Yes, for lifecycle if deemed to be from high-risk counterparty
Include contractual agreement for action to be taken in respect of supply chain participants in the event there is a violation of codes of conduct or human rights violations	Yes	Yes, should be in pre-existing / new contracts for on-going activities
Management representations that there is no modern slavery within their wider supply chains (as a last resort).	Yes, as far into the supply chain as reasonably possible	Yes, as far into the supply chain as reasonably possible

³ These principles take their inspiration from several sources, including the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on the Environment and Development, the United Nations Convention Against Corruption and the Organisation for Economic Co-operation and Development's (OECD) Anti-Bribery Convention.

Ongoing management

Following completion of the transaction RES takes primary responsibility for the implementation of TRIG's Sustainability Policy along with overall operational work control procedures across the portfolio. RES assesses risks to TRIG from sustainability issues including modern slavery and human trafficking on a periodic basis working with TRIG's supply chain. This includes quarterly and ad-hoc reporting to TRIG's Advisory Committee which comprises senior individuals from both RES and InfraRed.

The principal mechanism for the Managers to monitor sustainability-related risks related to the portfolio is an annual sustainability survey requiring specific information from the Asset Managers and O&M Providers. This also covers a range of indicators related to the management of modern slavery and human rights risks, such as:

1. Is there a Human Rights, Anti-modern slavery or an equivalent policy statement(s) in place that directly applies(y) to the Project / Portfolio Company, as a standalone policy or as part of a wider policy framework? If so, which of the following topics are explicitly covered by the policy statement:
 - Abolition of Child Labor | Elimination of All Forms of Forced or Compulsory Labor | Elimination of Discrimination in Respect of Employment and Occupation | Freedom of Association and the Right to Collective Bargaining | Occupational Safety and Health | Other, please specify in comments
2. Is there a Supplier Code of Conduct or an equivalent policy statement(s) in place that directly applies(y) to the Project / Portfolio Company, as a standalone policy or as part of a wider policy framework? If so, which of the following topics are explicitly covered by the policy statement:
 - Compliance with applicable laws and regulations | Promotion of fair labour practices and employment | Respect for human rights (as a minimum the International Labour Organization ("ILO") Fundamental Principles & Rights at Work)
3. Is there a process in place to identify and assess risks related to modern slavery, human trafficking and human rights violations related to the Project / Portfolio Company's activities and supply chains?
4. Did any risk events or alleged or confirmed violation of ILO norms take place during the reporting period? If Yes, provide details and remediation offered/implemented

During the reporting period, was the Project / Portfolio Company subject to any Human rights and/or Modern slavery related regulations? If so, confirm that the Project / Portfolio Company was fully compliant. At project level, policies, procedures and training relating to the prevention of modern slavery are assessed for both the project and its direct subcontractors.

In line with the Home Office's guidance of continuous improvement and deeper supply chain mapping, TRIG's Managers have undertaken efforts to enhance their visibility beyond Tier 1 suppliers where feasible and proportionate. This includes (i) identifying upstream supply chain segments relevant to the renewables lifecycle (development, construction, operations and decommissioning), (ii) prioritising mapping for high-risk categories (e.g., construction labour and key manufactured components), and (iii) developing a geographic overview of risk 'hotspots' (for example, using country/sector risk indicators and supplier location information) to inform due diligence focus.

TRIG is committed to maintaining transparency about progress and initiatives relating to modern slavery and human rights and provides further updates and case studies in its annual sustainability report.

Grievance mechanisms

TRIG's latest Whistleblowing Policy is available on the Company's website under 'Reports and Publications'.

TRIG does not directly employ staff. As detailed within the wider statement, the Board and Managers recognise the Company's responsibilities to society in relation to TRIG's supply chain, and the Company's Managers have their own grievance mechanisms in place. TRIG also recognises that effective grievance mechanisms should be accessible to those who may be impacted across the supply chain, including workers employed by contractors and subcontractors; and expects such mechanisms to be implemented by its direct suppliers.

If TRIG's Managers discovered that one of TRIG's or its portfolio companies' suppliers is accepting modern slavery in its business or supply chain, through due diligence processes or on-going management, its Managers would engage with the business to seek to prevent such practices from reoccurring in their business and, if necessary, seek to terminate its arrangement with the supplier at the earliest opportunity.

TRIG also has operational level grievance systems in place for the local community, where if and when local community need to lodge a grievance in relation to a TRIG project, the appointed asset management provider will escalate to the Company's Operations Manager for discussion and resolution.

Policies and standards

TRIG's approach to ethical business, specifically human rights, is governed using a comprehensive framework of policies and standards. Key policies and standards relating to TRIG's approach to mitigating risk of modern slavery include:

Policy	TRIG	InfraRed	RES
Exclusion Policy	TRIG has an Investment Policy available on the TRIG website	https://www.ircp.com/sustainability/	N/A –RES does not make investments on behalf of TRIG
Sustainability Policy	Available on the TRIG website	https://www.ircp.com/sustainability/	https://www.res-group.com/about-us/sustainability/
Modern Slavery Statement/Policy	This document	https://www.ircp.com/about/governance-documents/	https://www.res-group.com/modern-slavery/
Whistleblowing Policy	Available on the TRIG website	Yes, internal document	Yes, internal document
Anti-Bribery & Corruption Policy	TRIG has Anti-Bribery and Anti-Corruption Policies in place which are reviewed by the Board. A statement on this can be found in the latest Annual Report.	InfraRed has principles, policies, and standards in place for countering Bribery and Corruption.	RES has principles, policies, and standards in place for countering Bribery and Corruption.

Application and effectiveness

TRIG remains committed to the prevention of modern slavery, upholding minimum social safeguards and delivering the commitments set out in this document. It is acknowledged however, that there will be limitations to what can be achieved in practice. Beyond the direct suppliers that TRIG, its Managers and its portfolio companies deal with, there is an extensive supply chain where there are no direct contractual relationships. Through the use of sustainability surveys and engagement with stakeholders, the Company aims to increase visibility of the supply chain beyond the first tier. Our approach will continue to evolve in this area drawing on the emerging market practice on human rights due diligence and supply chain transparency.

This statement relates to The Renewables Infrastructure Group Limited and its group companies, including its immediate subsidiary The Renewables Infrastructure Group (UK) Limited.

Approval

This statement is made pursuant to section 54 of the Modern Slavery Act 2015, was approved by the Board of TRIG on 18 February 2026 and constitutes TRIG's slavery and human trafficking statement for the year ending 31 December 2025.

Richard Morse
Chairman

22 April 2026