

# Modern Slavery and Human Trafficking Statement

## Atrato Onsite Energy Plc

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### Introduction

Atrato Onsite Energy Plc (the “Company”) is a closed-ended investment company whose investment objective is to: support the net zero agenda whilst delivering capital growth and progressive dividend income to its shareholders; integrate ESG best practice with a focus on investing in new renewable energy capacity and onsite clean energy solutions; and target long- term secure income with limited exposure to wholesale power prices.

The Company is aware that its ability to manage the risks and opportunities of material ESG issues is fundamental to the delivery of long-term sustainable returns for its investors and that its activities and its method of delivery have the potential to impact on a broad range of stakeholders. It therefore intends to ensure that ESG considerations are reflected in all stages of the asset lifecycle and throughout all of its areas of operation.

The Company is committed to maintaining the highest standards of ethical behaviour and expects its business partners to do the same. The use of slavery (such as forced labour and child labour) and human trafficking is entirely incompatible with its ethics as a business and the Company believes that all efforts should be made to eliminate it from its supply chains and source responsibly.

The Company adheres to the AIC Code of Corporate Governance and works closely with its Investment Adviser, Atrato Partners Limited (the “Investment Adviser”) and other industry specialists to achieve the highest standards, and to counter direct and indirect support for slavery or human trafficking.

### Modern Slavery and Trafficking Statement

The Company is committed to ensuring that it trades ethically, sources responsibly and that there is no modern slavery or human trafficking in its supply chains or in any part of its business. The Company’s approach reflects its commitment to acting ethically and with integrity in all business relationships. Embedding accountability via ESG controls within the Company’s business enables the Company to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the Company’s supply chains.

## Organisation structure, business and supply chain

The Company seeks to achieve its investment objective by investing in solar photovoltaic generation systems and associated infrastructure. It is currently invested in clean energy assets located in the United Kingdom, with customers across a range of sectors.

As is typical for an investment company, the Company does not directly employ staff. The application of the Modern Slavery Act 2015 is accordingly most relevant to the companies in the Company’s supply chains, and to the Investment Adviser. The Board and the Investment Adviser recognise the Company’s responsibilities to society in relation to the Company’s supply chain.

The Investment Adviser works collaboratively with the Company’s business partners and seeks to ensure that its suppliers share the Company’s values and comply with relevant legislation.

Supplier	Project development	Project operational
Engineering, procurement and construction (EPC) contractors	✓	
Solar PV suppliers	✓	
Advisors (e.g. Legal/technical advisors, asset managers)	✓	✓
Utilities (distribution network operator, independent distribution network operator)	✓	✓
Third party service providers (e.g. Monitoring, metering, CCTV)		✓
Operations and maintenance (O&M) provider (including cleaning)		✓
Funders (e.g. Debt providers)	✓	✓

The supply chain exposure of the Company will vary depending on the project phase, for example whether it is in the development phase or operational.

## Policies and standards

The Company’s approach to ethical business is governed using a comprehensive framework of policies and standards. Key policies and standards relating to the Company’s approach to mitigating risk of modern slavery and human trafficking include:

Policy	Location
Modern Slavery Statement (this document)	Available on the Company’s website
Module Procurement Policy	Available on the Company’s website
Supply Chain Human Rights Policy	Available on the Company’s website
Anti-Bribery Policy	Available on the Company’s website

ESG Policy	Available on the Company’s website
Anti-Tax Evasion Policy	Available on the Company’s website
Investment Policy	Available on the Company’s website

### Due diligence processes for slavery and human trafficking

The Company has a zero-tolerance approach to slavery and human trafficking and is committed to ensuring its organisation and business partners operate with the same values.

The Investment Adviser undertakes a detailed due diligence exercise in respect of each investment opportunity which progresses beyond its initial screening phase including, as part of its ESG assessment, ensuring compliance with the Module Procurement Policy. No investment opportunity is progressed if there is an identified risk of modern slavery (such as forced labour or child labour) or human trafficking including those risks as they are associated with the supply chain.

### Risk assessment and management

We believe that our suppliers should be working to ensure modern slavery does not occur. This includes our suppliers’ subcontractors, who may use temporary and agency employees.

If the Company discovered that one of its suppliers was accepting of modern slavery or human trafficking in its business or supply chain it would engage with the business to seek to remove such practices from their business and, if necessary, terminate its arrangement with that supplier at the earliest opportunity.

The Investment Adviser is responsible for monitoring companies providing operational services to the Company’s portfolio of assets and ongoing implementation of the Company’s policies and standards. In this capacity, the Investment Adviser reports to directly to the Board and is required to escalate any material breaches of the ESG Policy.

The Company is aware of modern slavery risk concerns that have been raised within the solar sector regarding the procurement of solar modules, specifically in the Xinjiang Uyghur Autonomous Region ("XUAR") of China. The Company has published a specific module procurement policy to address these risks.

### Application and effectiveness

The Company remains committed to the prevention of modern slavery and upholding the commitments set out in this document. The Company’s commitment is guided by the principles in the Modern Slavery Act 2015 within the UK and associated global initiatives such as the UN Guiding Principles on Business and Human Rights, the UN Global Compact, and the OECD Due Diligence Guidance for Responsible Business Conduct. It is acknowledged however that beyond the suppliers that the Company and the Investment

Adviser deal with directly, there is a complex and extensive supply chain where there are no direct contractual relationships. As a result, there will be limitations as to what can be achieved in practice. However, the Company will continue to identify opportunities to further reduce the risk of human trafficking and modern slavery, increase transparency in the Company's operations and supply chain and respond effectively to new risks as they are identified. As part of this, the Company will continue to engage with industry led initiatives on human rights and the prevention of modern slavery, including by participating in relevant industry associations such as Solar Energy UK. The Company is also keeping abreast of the Solar Stewardship Initiative efforts to develop a supply chain traceability standard. The Company's policies, standards and processes will continue to evolve in this area as industry progress is made.

## Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we require our business partners to provide appropriate training to their staff and suppliers and providers. As part of the Company's commitment to further developing its due diligence mechanisms to identify, prevent and mitigate human rights impacts across its operations and, where possible, its supply chain, training requirements relating to Company's Board and the Investment Adviser will be reviewed over the coming year.

As a member of Solar Energy UK, the Company is engaged with relevant membership events, briefings and consultations on supply chain transparency and responsible sourcing.

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This statement relates to Atrato Onsite Energy Plc and Atrato Onsite Energy Plc's group companies, including its wholly owned UK subsidiary Atrato Onsite Energy Holdco Limited.

This statement, which is made pursuant to section 54 of the Modern Slavery Act 2015, was approved by the Board of Atrato Onsite Energy Plc and constitutes the Company's slavery and human trafficking statement for the year ending 30 September 2023.

Signed by:

**Juliet Davenport**

Chair

11<sup>th</sup> December 2023