

1. Introduction

Red Rocket Holding and our current and future subsidiaries (Red Rocket Group) oppose and do not tolerate modern slavery, child labour and human trafficking in all its forms. We make this statement to illustrate and explain the steps and measures taken to ensure that there is no modern slavery, child labour or human trafficking in our business or in our supply chains.

As Red Rocket, we believe that it is fundamental to set out good practices and adopt ethical principles, that will inspire and be reflected in all activities of the entities of the Group.

We undertake all necessary steps to combat modern slavery, child labour and human trafficking, ensuring that every person involved in Red Rocket benefits from a work environment which protects and respects their fundamental rights and freedoms.

2. Our Business Structure and Supply Chain

Operating as a global independent power producer in the renewable energy industry, Red Rocket produces electricity from renewable energy sources such as wind, solar, hydro and biomass. The Group's main activity is to sell electricity under long-term revenue contracts that ensure sustainable value for customers, shareholders and communities. Red Rocket maintains an active development program to discover new and innovative power-generation opportunities worldwide in order to increase its production base and create value for all shareholders and stakeholders.

The underlying ratio of our business and corporate structure is to utilise the most appropriate legal entity in each different jurisdiction the Red Rocket Group operates in, depending on the specific renewable energy project. At the same time, we aim to attract investors interested in funding the Red Rocket Group in the various renewable projects around the world, with the purpose of adapting to the situations of such investors.

Our ever-expanding Group relies on a wide selection of suppliers and other commercial counterparties, which can be small-medium sized enterprises, as well as large multinationals, each with its own supply chain. The majority of our projects involves the development of energy infrastructures and related services. Therefore, we do not manufacture or sell products to customers on consumer markets, so we do not operate directly large factories or production facilities. However, we purchase a significant amount of goods and services to support our business activities and administrative functions.



This implies that our supply chains are numerous and diversified. Having evaluated each of the Groups business operations and their supply chain, we have concluded that, in relation to modern slavery, child labour, and human trafficking, infrastructure construction in Non-EU/Non-western countries (such as Africa, South America, Middle East and Asia) is the activity that could present the greatest potential risks. As the Group relies on external contractors for maintenance and offices-related activities, such as cleaning, building services and security, these areas as well could involve problems and issues related to modern slavery, child labour and human trafficking.

3. Our Policies

Our policies and Code of Ethics reflects the Group's undertaking to acting ethically and with integrity within the Group and in all our business relationships. We are committed to implement and enforce effective systems and controls to ensure that modern slavery, child labour and human trafficking is not taking place at any level in our supply chains or in any part of our business. We are very dedicated to promoting ethical trading principles, based on the notion that acquiring goods and services should cause no harm to others.

We do not tolerate nor encourage any sort of discrimination, harassment or bullying and require all people working for and on behalf of the Red Rocket Group to respect and act in accordance with our policies, which are aimed to ensure equality and opportunity for all. The Red Rocket Group acknowledges and respects the personal dignity and personal rights of any individual. All members of our staff work with colleagues of any nationality, culture, religion, ethnicity, sexual orientation and gender. Everyone involved with the Red Rocket Group shall maintain a conduct inspired by transparency and moral integrity and, in particular, the values of honesty, fairness and good faith.

All of our policies are aimed to ensure that anyone who suspects breaches of any of the policies, their underlying principles or related procedures, as well as relevant and applicable laws and regulations feels comfortable in coming forward and can effectively report illegal, unethical or inappropriate conducts without fearing negative consequences or repercussions.



4. Due Diligence Processes for Modern Slavery, Child Labour and Human Trafficking

All the staff of the Red Rocket Group is hired with regular employment contracts and agreements and all employment relationships are regulated in compliance with applicable collective agreements of the specific sector and with applicable local legislative and regulatory provisions on tax and insurance. In addition, it is mandatory to require and obtain appropriate right to work documents and certificates for all members of the staff of the Red Rocket Group, including interns and temporary employees. Furthermore, the selection process of personnel and human resources, as well as in the system of remuneration, the Red Rocket Group applies policies and procedures based on the respect of equal opportunities and fair labour practices.

As part of our initiative to identify and mitigate risks related to modern slavery, child labour, and human trafficking, we have in place systems to:

- Identify and assess potential risk areas in our supply chains, by conducting detailed human rights due diligence, researching and enquiring about issues that could arise in relation to specific projects in areas particularly sensitive to modern slavery, child labour, and human trafficking;
- Mitigate the risk of modern slavery, child labour and human trafficking occurring in our supply chains, including by requiring our external suppliers and service providers to comply with the principles outlines in the Group's Code of Ethics and related policies (see more in the following section); and

Monitoring potential risk areas in our supply chains, by periodically requesting updates and reports on the progression and development of the projects and activities being carried out, specifically investigating on the working conditions of the individuals involved.

Due to the nature of the construction phase of a renewable energy project, temporary labour of varying skill levels is required. When appointing a project contractor, they are to provide a plan detailing how they will maximise the use of local labour where possible, and how such labour will be sourced.

5. Supplier Adherence to Our Values and Ethics

All the activities relating to the contracting parties must be conducted in accordance with principles of honesty, fairness, transparency and openness, and must uphold high standards of competence, professionalism, dedication and efficiency. To ensure that all those external entities and contractors belonging to the Red Rocket Group's supply chain respect the



Group's values and ethics, we have in place practices that ensure and monitor compliance with our ethical commitment. In particular, we establish relationships exclusively with suppliers and counterparties which enjoy a proven respectable reputation, and whose ethical corporate culture is comparable to ours.

We guarantee transparency of the agreements and contracts, avoiding signing contracts or agreements contrary to law and we maintain transparent and collaborative relationships with counterparts to ensure strict compliance with applicable labour laws. All our staff and entities are instructed to promptly report to the competent corporate bodies and supervisory authorities any conduct of the other party that appears contrary to the ethical principles that permeate the Red Rocket Group business, especially in regard to labour relations.

As the Red Rocket Group does not tolerate any form of modern slavery, child labour and human trafficking, suppliers and sub-contractors are vetted and evaluated to ensure that they are compliant with and committed to implementing ethical labour practices. The Red Rocket Group requires that all counterparties and suppliers adopt adequate and satisfactory measures to avoid any form of forced or compulsory labour within their own activities and expressly confirm that modern slavery, child labour, and human trafficking are not part of their business. Such commitments are verified both when entering into a new contractual relationship with an external third party and when renewing existing contracts.

Companies belonging to the Red Rocket Group must include specific provisions in the contracts and agreements signed with them to abide to the principles of the Group's Code of Ethics and related policies. In contracts in which we have specifically added clauses and appropriate wording about modern slavery, child labour, and human trafficking, we check on a regular basis and we strictly supervise compliance with these clauses as part of our key performance indicators and project governance.

When concerns are raised that the organisations we interact with are engaged in modern slavery child labour, and human trafficking, we have undertaken to terminate immediately our commercial relationship and share such concerns with the relevant authorities that have the power to investigate and take enforcement action applicable local regulatory and legal provisions. We are committed to cooperate and work closely with the competent authorities to coordinate in enforcement actions and responses through appropriate protocols and procedures.



6. Training

Anti-slavery activities are embedded in the Red Rocket Group's standard practices and we believe that human rights are better protected and realised only through demands of people which are informed and aware of their entitlement to them. To ensure a high level of understanding of the risks of modern slavery, child labour and human trafficking in our supply chains and our business activities, we provide training to our staff to apply good practice in the prevention of such crimes, so that the underlying principles and standards of the Red Rocket Group's Code of Ethics and policies are understood and reflected in their performance of personal responsibilities and behaviours. In particular, our contract managers are specifically trained and instructed to monitor compliance with our Code of Ethics and policies in the realisation of the projects they are supervising.

We also require our business partners to provide training to their staff and suppliers and providers.

7. Our Effectiveness in Combating Modern Slavery, Child Labour and Human Trafficking

In the next statements, we plan to use the following key performance indicators (KPIs) to measure how effective we have been at ensuring that modern slavery, child labour and human trafficking is not taking place in any part of our business or supply chains:

- The number of prospective suppliers and sub-contractors successfully evaluated as compliant with ethical labour practices;
- The number of enquiries and inspections of direct suppliers and sub-contractors in our supply chains in the past year;
- The number of reported breaches in the past year and how they were dealt with; and
- The percentage of staff receiving training on identifying and addressing the risk of modern slavery, child labour and human trafficking in our business and supply chains.

8. Further Steps

The Red Rocket Group is committed to improving the internal practices to prevent and fight modern slavery, child labour, and human trafficking. Following a review of the effectiveness of the steps we will take this year to ensure that there is no modern slavery, child labour or human trafficking in our supply chains, we intend to take the following further steps to combat modern slavery, child labour, and human trafficking:



- To uphold and proceed in our commitment against modern slavery, child labour, and human trafficking to include all our new subsidiaries and projects, with special attention on procedures of selection of ethically compliant suppliers and external service providers;
- To promote a culture of good practices and procedures within the Group that will increase awareness on modern slavery, child labour, and human trafficking, to help prevent and eradicate correlated behaviours and conducts;
- To enhance the staff's training and capacity building about modern slavery, child labour and human trafficking issues, measuring and evaluating changes in awareness of risks;
- To collect more information in order to increment the understanding we have of our supply chains, their challenges and problematic areas, especially in relation to labour providers and recruiters; and
- To verify and increase the effectiveness of the Red Rocket Group's procedures, ensuring swift responses and actions in the case concerns and complaints are raised.

As risks related to our business can change over time, especially because of the steady expansion of the Red Rocket Group, we will review and update this statement and our approach to maintain our business activities and supply chains free from modern slavery, child labour, and human trafficking annually.



M. Brambilla
Chief Executive Officer

Signed:

Date: January 2021

