Modern slavery statement

Organisation

This statement applies to BayWa r.e. UK Limited (referred to in this statement as “the Organisation”) and its parent company, BayWa r.e. AG (referred to in this statement as “the Group”). The information included in the statement refers to the financial year 2026.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom, and in many cases exceeds those minimums in relation to its employees.

The Group has been subject to the scope of the (German Law) Supply Chain Due Diligence Act (LkSG) since 1 January 2024. In order to implement the various requirements of the LkSG and the upcoming additional requirements at European level, the Group has set up a social compliance function. This function implements the legal requirements relating to human and environmental rights in its own

business operations and in the supply chain. In this context, a corresponding social compliance management system (SCMS) has been set up and implemented.

In addition, BayWa r.e. is a member of the Energy Industry Dialogue and the Solar Stewardship Initiative (SSI), both multi-stakeholder platforms that deal with social and environmental issues and risks in the energy industry. With the Energy Industry Dialogue, the participating companies, associations, trade unions, civil society organizations, the German Institute for Human Rights and the Federal Ministry of Labor and Social Affairs (BMAS) want to pool expertise and resources to better understand human rights risks in the German energy industry and along the global supply chain. SSI, on the other hand, is developing several standards, including an ESG standard and a supply chain traceability standard, to audit due diligence obligations at the various locations of their supply chains.

Organisational structure

The Organisation is based entirely within the United Kingdom, with its head office situated in Edinburgh. There are branches in Glasgow and an office of a wholly owned subsidiary in Milton Keynes. The Organisation is a wholly owned subsidiary of the Group. The Organisation has two directors. The Organisation is a developer of renewable energy projects – the operations are not seasonal.

The labour supplied to the Organisation in pursuance of its operation is carried out in its offices and remotely on its sites throughout the United Kingdom.

Supply chain structure

In order to fulfil its activities, the Organisation relies on supply chains supporting its renewable energy activities in the UK. These include the supply of goods and services required for the development, construction, operation and servicing of solar and wind projects and battery energy storage systems, where relevant to the Organisation’s activities. As part the Group, the Organisation participates in global renewable energy supply chains involving suppliers, contractors and other business partners across different product categories, sectors and geographies.

The Organisation’s supply chain includes direct suppliers that may, in turn, rely on manufacturers, subcontractors and other suppliers at lower tiers. The supply chain may therefore extend beyond businesses with which the Organisation has a direct contractual relationship. Given this potentially multi-tiered structure, the Organisation recognises that human rights and environmental risks, including forced-labour risks, may arise in certain product categories and geographies.

Organisational policies

The Group has the following policies which further define its stance on modern slavery:

Our ESG policy website, including the BayWa r.e. Code of Conduct and the Supplier Code of Conduct can be found here: Our ESG policies and guidelines | BayWa r.e. Our Human Rights Policy can be found here: human-rights-policy.pdf and our current Sustainability Report (Sustainability Update 2024) can be found here: baywa-re-sustainability-report-2024.pdf

Assessing and managing risk

The Organisation considers its principal exposure to modern slavery and human trafficking risks to arise in the procurement of components, materials and services used in the development, construction, operation and servicing of renewable energy projects. These risks may occur in particular product categories, sectors and geographies and may extend beyond direct suppliers to manufacturers, subcontractors and other lower-tier suppliers.

As part of the BayWa r.e. Group's Social Compliance Management System, supplier risks are assessed using factors including country and sector risk, complaints, adverse-media screening, procurement volume, contractual relationships and supplier self-disclosures. The assessment also considers the severity and likelihood of potential harm and the Organisation's ability to influence the supplier.

Due diligence in relation to modern slavery

The Organisation operates within the Group's human rights due-diligence framework. Relevant measures include risk-based supplier assessments, contractual requirements under the Supplier Code of Conduct, supplier self-disclosures, audits and other controls where appropriate, and engagement with suppliers where risks are identified.

Suspected violations may be reported through the Group's complaints procedure, including its anonymous web-based whistleblowing system, CompCor. Reports are reviewed by the relevant Group functions, and appropriate preventive or remedial action may include further investigation, training, enhanced controls, written warnings or, in serious cases, termination of the business relationship.

Training

The Organisation provides onboarding training to staff to effectively implement its stance on modern slavery.

Monitoring and evaluation

The Organisation's wider group requires key suppliers to adhere to its Supplier Code of Conduct, which can be found here: Our ESG policies and guidelines | BayWa r.e.

Steps

To its express knowledge, Organisation has not conducted any direct business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Group has taken the following steps to ensure that modern slavery is not taking place:

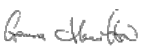
- require key suppliers to adhere to its Supplier Code of Conduct;
- the BayWa r.e. group uses a platform for an abstract risk analysis of its own business units and direct suppliers;
- access for third parties, suppliers and employees to the Organisation's group's whistleblower system and its complaints procedure. Reports received from internal and external stakeholders via the dedicated whistleblower mechanism are evaluated by the Corporate Compliance team. In the event of proven material impacts (actual or potential), the Social Compliance function will contact the relevant supplier in coordination with the relevant business units to first obtain further information on the matter and, if necessary, discuss possible remedial measures.

Modern slavery compliance officer

The Organisation has a modern slavery compliance officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of s.54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 30-Oct-2026

Signed: 
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Job Title: Managing Director
Date: 30-Oct-2026