

# Statement on Modern Slavery

Last updated June 30, 2022



### Introduction

Bluefield Solar Income Fund (BSIF) is committed to constant vigilance and implementation of regularly reviewed policy and practice, to combat slavery and human trafficking. BSIF manages its affairs primarily through its Investment Adviser Bluefield Partners LLP and its asset management and operational contractors. During the investment process, the Investment Adviser ensures each asset undergoes detailed due diligence and compliance checks to determine that they are free from association with prohibited practices in these areas. Ongoing management of these assets, and future construction projects, conform to required industry standards and in collaboration with business partners who manage the assets, we seek to identify areas for improvement. BSIF adheres to the AIC Code of corporate governance and works closely with the Investment Adviser and other industry specialists to achieve the highest of standards, and to counter direct or indirect support for slavery or human trafficking.

To date, BSIF has invested in assets which have been either constructed prior to purchase or were funded through construction. No asset in the BSIF existing portfolio was built after March 2017 and the majority were built and became operational between 2013 and 2015.

BSIF is an investment company focused on the acquisition and long-term management of a diversified portfolio of low carbon assets in the UK. The Company has an annual turnover in excess of £65 million and an asset portfolio as at 31 December 2022 of 816 MegaWatts Peak (MWp).

## **Modern Slavery and Human Trafficking Statement**

BSIF is committed to ensuring that there will be no modern slavery or human trafficking in its supply chains or in any part of its business. BSIF's approach reflects its commitment to acting ethically and with integrity in all business relationships. Embedding accountability via the environmental, social and governance (ESG) controls developing within our business is enabling us to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

### Due diligence processes for slavery and human trafficking

BSIF 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 due diligence applied during the acquisition process is concentrated upon the working practices of contractors connected to assets under consideration, in line with the specifics of the renewable industry involved. As required, wide consultation takes place with external and internal experts.

Our continual monitoring of third-party operations through ESG principles and close attention to regulatory and Health and Safety requirements allows for a thorough check of good operating practices to safeguard against breaches of slavery and human trafficking best practice.

As part of our initiative to identify and mitigate risk, we require contractual commitment from our supply chain to implement the active pursuit of policies to identify and assess potential risk areas and to mitigate the risk of slavery and human trafficking occurring in their business relationships with us. We support this with regular audits of our suppliers and actively monitor potential risk areas in our supply chains. Collaboration, and a solution-based approach, including training, enables issues to be exposed and resolved.

# Our effectiveness in combating slavery and human trafficking

BSIF is committed to continually improving its approach to the management of ESG risks and opportunities. As BSIF looks to build new installed capacity, due diligence processes, especially in relation to our contractual arrangements, will be reviewed and improved in order to further enhance the way we combat issues of human trafficking and modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ended 30 June 2022, which was approved by the Board on 29 September 2022.

Name: John Scott, Chair

Company: Bluefield Solar Income Fund