

Modern Slavery Statement

1. Organisation and structure

The Fidra Energy group of companies¹ (“**Fidra**”) is an independent developer and operator of battery energy storage systems (“**BESS**”), headquartered in Edinburgh, UK. The company began operations as a BESS platform following completion of the sale of its operational business, West Burton Energy, in August 2024. As of 1st January 2025, we have 12 employees.

Fidra is owned by EIG, an infrastructure investor headquartered in Washington, DC, with offices in Houston, London, Sydney, Rio de Janeiro, Seoul and Hong Kong. EIG has a 40-year track record of investing in the energy and infrastructure sectors and has a singular focus in private investments in energy and energy-related infrastructure. EIG’s clients include many of the leading pension plans, insurance companies, endowments, foundations and sovereign wealth funds in the U.S., Asia, and Europe.

Fidra’s vision is to enable the energy transition supporting the deployment of more renewable electricity generation through the development of large-scale battery storage projects in the UK and other European markets. Fidra has ~3GW of BESS in development with an ambition to deploy ~10GW by 2030.

As part of our commitment to responsible business practices, we acknowledge the potential human rights and modern slavery risks associated with the energy infrastructure sector, including within the sourcing and deployment of battery systems. Fidra fully supports the aims of the Modern Slavery Act 2015 (the “**Act**”) and actively works to eradicate the risk of modern slavery and human trafficking within our business activities. We have implemented and will continue to develop and strengthen systems and controls to ensure that modern slavery and human trafficking do not occur within our organisation or whole value chains.

This is our first statement under the UK Modern Slavery Act. Below, we outline the policies we have in place and the actions we are taking.

2. Policies in relation to human rights

Fidra Energy respects and upholds all internationally recognized human rights and has zero tolerance of modern slavery in all its forms. We recognise our responsibility to identify, assess and manage risks within our own business operations and supply chain to ensure ongoing elimination or prevention of modern slavery and human trafficking. We align these processes with the UK Modern Slavery Act and two key international standards, the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines). This commitment, along with an outline of our human rights due diligence processes, is detailed in our Human Rights Policy, available on our website.

Under our Code of Conduct, employees must not engage in, facilitates, or fail to report any activity that might lead to a breach of this Human Rights Policy. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.

3. Human Rights Due diligence: Assessment and management of human rights risks

¹ As at 1st January 2025, the Fidra group comprises UK Transition Power Holdings, Ltd. (incorporated in Jersey), Fidra Energy Limited, Fidra Energy Projects Limited, Thorpe Marsh Energy Park Limited, Thorpe Marsh Green Energy Hub Limited, Thorpe Marsh Holdings Limited, West Burton C Limited, Bicker Drove Limited.

3.1. Risk identification and assessment

Fidra Energy is in the early stages of embedding human rights due diligence processes. Following the publication of our Human Rights Policy, we conducted our first high-level human rights risk assessment in Autumn 2024. This assessment identified our procurement of BESS, primarily sourced from China, as the highest area of modern slavery risk within our supply chain. However, our first assessment did not identify any actual violations or instances of non-compliance within our supply chain for the reporting year. Additionally, our grievance mechanism, accessible to all stakeholders, has not received any reports of human rights violations across our operations during this period.

Fidra Energy is committed to scaling up our risk assessment methodology in alignment with the principles of the UNGPs and the OECD Guidelines. A more detailed annual assessment of human rights risk will be implemented starting in 2025.

3.2. Actions taken to manage the identified risks

To mitigate the identified risk, we undertake appropriate due diligence on our key battery system equipment suppliers and require them to comply with the provisions of the Modern Slavery Act. We engage with stakeholders and suppliers to address modern slavery risk in our supply chains, in particular the procurement of battery systems and other equipment required to build our pipeline of BESS projects.

We take a risk-based approach to our contracting processes, and we include specific prohibitions against the use of modern slavery and trafficked labour in our contracts with key suppliers. ESG criteria, including the expectations set forth in our Human Rights Policy, are part of our assessment when selecting key equipment and service suppliers, and we request information from them relating to their own business and their direct and indirect suppliers e.g., the source of raw materials and components, and how they monitor and enforce compliance with their own policies.

An example of how we implement human rights due diligence is our recent collaboration with a key supplier. In November 2024, we announced a strategic partnership with Sungrow in respect of the procurement of battery equipment systems for our projects in UK and other European markets. As part of our selection process, we assessed Sungrow's commitment to human rights and the final procurement contracts will include a requirement for the supplier to abide by all relevant laws and regulations in relation to anti-slavery and human trafficking.

Sungrow and its key suppliers operate outside high-risk areas, such as Xinjiang, which further mitigates potential concerns. Nonetheless, as part of our ongoing risk assessment, we visited the manufacturing facilities of Sungrow and its key supplier to satisfy ourselves that policies and procedures, as well as working conditions, are consistent with our own values. These visits confirmed that the supplier operates in alignment with Fidra Energy's expectations.

3.3. Monitoring and engagement

We will continue to monitor compliance with the Fidra Energy's Human Rights Policy and the Modern Slavery Act by our supply chain, and where we identify instances of non-compliance, we will take appropriate action which may include suspending or terminating that supplier relationship. We recognise the challenge of addressing risks in high-risk regions such as parts of China and acknowledge that we have limited influence in certain aspects of the supply chain given the global scale of our likely suppliers.

3.4. Grievance mechanism

Fidra Energy is committed to providing accessible and effective grievance mechanisms to address human rights concerns. If an employee or a third party becomes aware of anything that falls short of our standards of conduct and/or which amount to an abuse of human rights, they are encouraged to report this. To facilitate this, we have established multiple reporting channels, including an independent third-party reporting platform, Safecall (www.safecall.co.uk/report), through which all stakeholders can report any suspicions of modern slavery or human trafficking concerns.

Further details about Fidra Energy's grievance mechanism and how concerns are addressed are set out under our Whistleblowing Policy, available here ([Whistleblowing-Policy.pdf](#)) and on our website. We ensure that all reports are treated with confidentiality, and individuals raising concerns in good faith are protected from any form of retaliation.

4. Training on human rights

We require all Fidra Energy's employees to take mandatory training on modern slavery and human trafficking to ensure a high level of understanding of these risks in our operations and in our supply chain.

5. Roles and responsibilities

The roles and responsibilities for compliance with the Act are set out under our Human Rights Policy, which can be found on our website.

6. Associated policies and procedures

Code of Conduct (approved by the Board)
ESG policy (approved by the Board)
Human Rights Policy
Anti-fraud and anti-bribery framework
Procurement policy
People policy
Whistleblowing policy

Signed:



Chris Elder
Chief Executive Officer
4th December 2024