



GRANSOLAR GROUP MODERN SLAVERY STATEMENT



Title	Gransolar Group Modern Slavery Statement
Geographical Scope	Gransolar Group and its subsidiaries
Category	Declaration / Statement
Date of Approval	28/05/2025
Approved by	Grupo Gransolar's CEO

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This statement addresses the period from January 1, 2024, to December 31, 2024, in compliance with the requirements of the United Kingdom Modern Slavery Act, the Australia Modern Slavery Act, and the US Business Supply Chain Transparency on Trafficking and Slavery Act.

Grupo Gransolar, S.L. takes a consolidated, whole-of-group approach to ethical sourcing. As such, this statement addresses the actions taken not only by reporting entities, but all subsidiaries within Gransolar Group on a consolidated basis. The subsidiaries taken into consideration for the elaboration of this document are listed in the Reporting Entities title.

It describes the steps taken during 2024 and that will be taken by Gransolar Group and its subsidiaries during 2025, to mitigate the risk of modern slavery in the Group's businesses and supply chain.

1. INTRODUCTION

Gransolar Group (or Gransolar hereinafter), as a global player in the photovoltaic industry, recognises its responsibility to identify, prevent and mitigate the risks associated with modern slavery and forced labour in its operations and supply chain. In compliance with the UK's Modern Slavery Act 2015 and Australia's Modern Slavery Act 2018, this statement sets out the company's commitment to eradicate any form of labour exploitation within its sphere of influence.

According to the International Labour Organization (ILO), the term modern slavery covers a set of legal concepts, including forced labour, debt servitude, and human trafficking. It is an umbrella term to refer to situations of exploitation that an individual cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power.

Gransolar Group and its associated companies operate throughout the entire value chain of the photovoltaic sector, from the manufacture of components to the design, development, construction, and management of solar energy installations. With a presence in more than 30 countries, including activity in regions with a potential risk of labour rights violations, such as China and India, the company implements supervisory mechanisms to ensure regulatory compliance and the protection of human rights.

Our corporate policy is based on respect for human rights, as set out in our **Code of Conduct**, People Framework Policy, Sustainability Framework Policy and Human Rights Regulations. These documents expressly prohibit any form of modern slavery, forced labour or human trafficking within our operations and business relationships.

Through a robust due diligence framework, legal compliance monitoring and collaboration with our partners and suppliers, the Gransolar Group reaffirms its commitment to promoting safe, equitable

and sustainable working environments. This statement reflects our continuous effort to improve our practices and strengthen modern slavery prevention mechanisms in all our business activities.

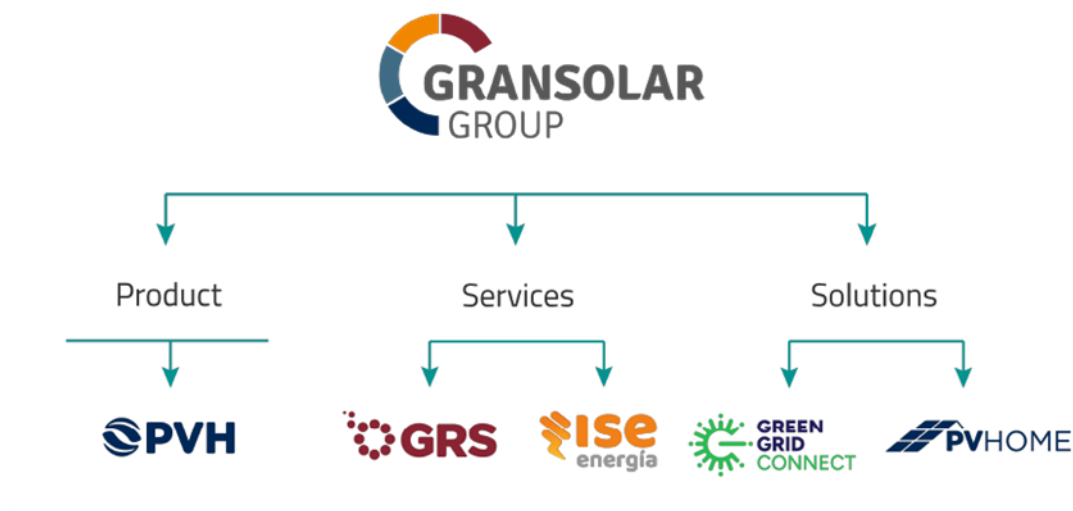
This is Gransolar's third statement, and it provides an overall view of the measures and actions taken by the Group in order to tackle any violations or breaches on Human Rights. Moreover, we will provide the actions of our commitment for 2025.

Gransolar and its subsidiaries have been long committed to the respect, promotion, and defence of human rights. Gransolar Group is committed to observing the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the ten principles of the United Nations Global Compact. Together, these principles help us identify and respond to potential human rights and modern slavery risks.

2. BUSINESS STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Gransolar Group is active throughout the entire value chain of the photovoltaic project creation process through its different business lines. The company, headquartered in Madrid (Spain), operates nationally and internationally in more than 30 countries on five continents, including Spain, Australia, the United States, the United Arab Emirates, South Africa, Saudi Arabia, Brazil and Mexico.

The Gransolar Group and its various business units cover the entire process of manufacturing certain components, design, construction and maintenance of photovoltaic projects. In order to manage its projects as efficiently as possible, the Group has offices in 11 countries, the main ones being in Spain, Australia, the United States and Saudi Arabia. In Spain, where most of its team is located, it has representation for all business lines in Madrid; it brings together the bulk of GRS Engineering, GRS O&M, ISE Energía and PVHome workers in Almería; and it has an important manufacturing centre and PV Hardware offices in Cheste (Valencia). It also has two other manufacturing centres in Jeddah (Saudi Arabia) and another in Houston (USA).



Our activity is marked at all times by the values, principles and behavioural guidelines set out in the **Code of Conduct**, which was last updated by the Board of Directors on 31 May 2023, this being the latest version in force.

This latest version establishes the following as the general guiding principles for all relations with our stakeholders:

1. Support and respect for the protection of internationally proclaimed human rights in the exercise of its activity, and no complicity in any violation of human rights.
2. All Gransolar's operations will be carried out in an ethical and responsible manner.
3. Compliance with the legislation in force in each country is a necessary part of this Code.
4. The behaviour of Gransolar employees will be in line with both the content and the spirit of the Code of Conduct and Responsible Practices.
5. All natural and legal persons who have, directly or indirectly, an employment, economic, social or industrial relationship with Gransolar will be treated fairly and with dignity.
6. All Gransolar's activities will be carried out in the most environmentally friendly manner, considering the conservation of biodiversity and the sustainable management of natural resources.

- 7. Gransolar will conduct its business and manage its assets in compliance with anti-corruption legislation, anti-money laundering legislation, legislation on insider trading and the corresponding sanctions.

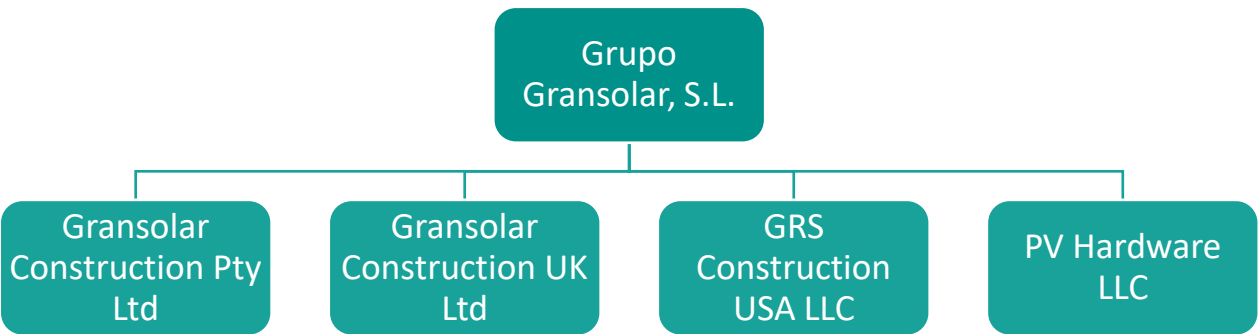
2.1. Reporting Entities

This statement is provided by Grupo Gransolar S.L. (CIF B05397286) as a joint statement under the Modern Slavery Act. It covers Grupo Gransolar S.L. and all of its subsidiaries (more info in Annex I), with special mention to the following reporting entities:

- 1. Gransolar Construction Australia Pty Ltd (ACN 640 607 209),
- 2. Gransolar Construction UK Ltd (CN 12296877),
- 3. GRS Construction USA LLC (EIN 99-0362427), and
- 4. PV Hardware LLC (EIN 45-1803481).

This statement was developed in consultation with each of the above reporting entities, throughout the country managers. The consultation process has been set in accordance with the requirements of section 14(2)(d)(ii) of the Modern Slavery Act, this statement was approved by the Board of Gransolar Holdings S.L. on May 28th, 2025, and is signed by Grupo Gransolar’s, S.L. CEO.

2.2. Organization Chart



2.3. *Supply Chain*

Grupo Gransolar S.L. and all its subsidiaries share the same supply chain, highlighting the particular case of PV Hardware Solutions S.L. and its subsidiaries in different countries. This is due to the specific raw materials required by our factories around the world (Spain, USA and Saudi Arabia).

The Gransolar Group's supply chain within the framework of projects covers the planning, negotiation and acquisition of goods and services for the Group, through the development of a methodology and strategy capable of managing all the elements involved in this process.

PVH establishes global agreements to guarantee supply, meet quality requirements and ensure global competitiveness. A key element of our competitive advantage is the in-house manufacture of most of the components used in the structure of solar trackers at our plants in Cheste (Valencia, Spain), Jeddah (Saudi Arabia) and Houston (Texas, USA). Therefore, a significant volume of purchases is focused on raw materials from suppliers in Europe, Asia (especially China), North America and India. Further details on our suppliers and the goods supplied can be found in the Annexes section.

Our current Purchasing Policy applies to all companies in the Gransolar Holdings Group, as well as its subsidiaries under effective control. This policy establishes how we work with our suppliers, the approval and homologation process, and prioritises those with high volume or critical for the quality of supply. We assess suppliers using different control ratios, including sustainability criteria.

From the end of 2023, we use the Achilles platform to streamline our supplier assessment and certification processes. Achilles allows us to identify and mitigate risks that we could not adequately assess before, including reputational risks and ESG (environmental, social and governance) aspects.

We have a **Supplier Code of Conduct**, updated in line with the new governance structure approved at the end of 2024. This code sets out criteria to be met by all suppliers in performing their duties, ensuring professional, ethical and responsible conduct in line with the Group's culture. The recent review assessed the need for further elaboration on some key aspects.

In addition, we have incorporated a Human Rights Clause (HRC) applicable to all our suppliers, covering:

- Social: labour rights (working conditions, fair treatment, wages, migrant labour), prohibition of discrimination, elimination of child and forced labour, and occupational health and safety standards.
- Environmental: reduction of CO₂ emissions, responsible waste management, among others.

- Governance: anti-corruption, regulatory compliance, accountability, due diligence, remediation, transparency and business ethics.

The Gransolar Group has been certified under the international standard, ISO 20400 in Sustainable Procurement since June 2022. We are currently preparing the renewal audit, reaffirming our commitment to international best practices.

In the event of breaches of the Code of Conduct, we reserve the right to monitor, supervise and adopt measures that may include legal, criminal or administrative consequences, as well as the possible disqualification of the supplier.

3. GOVERNANCE, ACCOUNTABILITY AND DUE DILIGENCE

3.1. Code Of Conduct and Ethics

Gransolar is firmly committed to conducting business in an ethical, responsible, and lawful manner across all its operations. Our Code of Conduct applies globally to all subsidiaries and country branches, serving as the foundation for the standards of behaviour expected from all employees, regardless of role or location. It outlines not only the way we conduct our business but also provides ethical and behavioural guidance to help our teams apply these principles in their day-to-day responsibilities.

The Code clearly states that all employees have a duty to report any conduct that violates its principles. These may include unethical, illegal, or non-compliant actions that could compromise Gransolar's integrity or reputation. We take all breaches of the Code of Conduct very seriously. Violations may lead to disciplinary measures, up to and including summary dismissal, independent of any civil or criminal liability. In the case of equity partners, such breaches are addressed through a partner-specific disciplinary process.

In line with our commitment to integrity throughout our value chain, Gransolar has also implemented a Supplier Code of Conduct. This document complements our corporate Code and sets clear expectations for all third parties working with or on behalf of Gransolar. It explicitly prohibits practices such as modern slavery, child labour, and forced labour, and aligns with international standards on human rights and labour protections.

Together, our internal and supplier Codes of Conduct reinforce a unified approach to ethical conduct and compliance, both within our organisation and throughout our supply chain.

3.2. Our Principles and Policies

At Gransolar, we communicate our values and expectations through clear, robust policies that reflect our unwavering commitment to human rights. We set high standards for ourselves and our partners, making it explicitly clear that modern slavery, forced labour, and child labour have no place in our operations or supply chain. We are dedicated to continually evolving our approach, regularly reviewing and updating our policies to address emerging risks and reinforce our ethical framework.

Gransolar is deeply committed to ensuring that all individuals involved in or affected by our business are treated with dignity and respect. These principles are integral to our corporate identity and demonstrate our long-standing support for internationally recognized human rights, including the right to freely chosen employment. We categorically reject any form of forced labour, human trafficking, prison labour, indentured servitude, or bonded labour across all areas where we operate.

Our commitment is guided by leading global frameworks such as the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the Core Conventions of the International Labour Organization (ILO), including the ILO Declaration on Fundamental Principles and Rights at Work. These standards form the basis of our human rights' due diligence practices.

To embed these commitments into our operations, we have implemented a comprehensive Supplier Code of Conduct and a Purchasing Policy aligned with the ISO 20400 standard on sustainable procurement.

These tools establish clear requirements for our suppliers, including explicit prohibitions on forced and child labour, and set forth processes for supplier approval, homologation, and ongoing monitoring. Contractual clauses enforce these obligations, with risk assessments tailored to country, sector, and supplier profile.

In addition to our preventive policies and internal controls, Gransolar has developed and implemented a comprehensive Criminal Compliance Model (CCM), serving as a final safeguard against potential legal and ethical breaches. This model is designed to prevent criminal liability arising from serious misconduct, including offences related to modern slavery, child labour, and forced labour within our operations and supply chain. The CCM applies to all companies within the Gransolar Group, including those in which we hold a majority shareholding, and is implemented across all jurisdictions where we operate — including the United Kingdom and Australia.

The Board of Directors has appointed a Supervisory and Oversight Body with independent authority to monitor the operation and enforcement of the CCM. This body reports directly to the Board and functions with full autonomy. In line with best practices under the UK and Australian Modern Slavery Acts, we recognise the importance of board-level oversight and transparent governance to address modern slavery risks.

Training and awareness are critical to our crime prevention strategy. Annual training plans are developed by the Human Resources Department in coordination with the Supervisory and Oversight Body, including specific communication initiatives tailored to the identified risk areas. These activities ensure that all personnel — including senior leadership — understand their obligations in preventing modern slavery and other serious offences.

To ensure ongoing effectiveness, the Supervisory and Oversight Body prepares an annual CCM working plan, detailing planned actions, resource needs, and compliance reviews. This includes tracking reported incidents, non-conformities, and complaints. A whistleblowing channel, compliant with the EU Whistleblowing Directive and consistent with UK and Australian whistleblower protections, is in place to allow anonymous reporting of any concerns. To date, no complaints relating to modern slavery have been received.

Finally, in alignment with both UK and Australian legislative requirements, all contractors and suppliers are contractually bound to comply with the CCM and its underlying principles. This commitment forms part of our broader due diligence framework, reinforcing our zero-tolerance stance on modern slavery across our entire global value chain.

Through this integrated and evolving approach, Gransolar reinforces its commitment to operating responsibly, ethically, and in full respect of the rights and dignity of all people connected to our business.

3.3. Due Diligence, Grievance, and Remediation

At Gransolar, we are firmly committed to promoting ethical conduct and protecting human rights across all aspects of our operations and supply chain. We encourage all stakeholders—including employees, contractors, suppliers, and members of local communities—to report any conduct that may be unethical, illegal, fraudulent, or otherwise inappropriate. This includes, but is not limited to, suspected cases of modern slavery, forced labour, child labour, and other adverse human rights or environmental impacts.

To support this commitment, we:

1. Have implemented a Whistleblowing Channel that is open and accessible to our stakeholders. This mechanism allows individuals to raise concerns anonymously and confidentially and ensures the secure handling of all information received. In line with Spanish Law 2/2023, which transposes EU Directive 2019/1937 on the protection of persons who report breaches of Union law, Gransolar updated and strengthened its internal reporting system by approving a dedicated Policy and Procedure for our Internal Information System. This upgrade enhances protections for whistleblowers and reaffirms our zero-tolerance approach to any form of retaliation.

To date, no complaints or reports of human rights violations—including cases of modern slavery, child labour, or forced labour—have been received through this channel. While this is a positive indication, we remain vigilant and proactive in reinforcing our commitment to ethical practices.

2. We conduct robust due diligence with our suppliers, recognising the challenges they may encounter in meeting our Supply Chain Standards. We work collaboratively with them to support continuous improvement and drive best practices throughout our value chain. As part of this, due diligence principles have been defined and implemented across the entire supply chain. These are aimed at identifying, preventing, and mitigating risks related to human rights violations through structured assessment and ongoing monitoring.
3. Additionally, we have integrated specific contractual clauses that require all suppliers to respect human and labour rights. These clauses establish clear consequences in the event of non-compliance. We also carry out risk assessments based on criteria such as country of origin, industry sector, and supplier type, allowing for a tailored and risk-sensitive approach to managing supplier relationships.

Our Supplier Code of Conduct and Purchasing Policy, aligned with ISO 20400 standards on sustainable procurement, clearly outline our expectations regarding environmental and social responsibility. These documents form the foundation of our ethical sourcing practices and guide our engagement with suppliers to ensure accountability and transparency.

Through these comprehensive measures, Gransolar reaffirms its unwavering commitment to upholding human rights and fostering a responsible, sustainable global supply chain.

4. RISK IDENTIFICATION AND ASSESSMENT

Gransolar is conscious of the importance of addressing any potential modern slavery risk within our organization and operations. We implemented a monitoring and controlling system to avoid any risk or hazard in the development of our activity. As an EPC company, we rely and firmly depend on our supply chain. Gransolar undertakes an annual assessment related to risk, as part of our Action Plan 2021-2025. This risk identification is based on a classification depending on the area the impact the most:

- **Economical and Financial Risks:** Risks that may have an impact on the economic and financial structures of the organization, such as cash flow, benefits, trading, earnings, funds, etc.
- **Timescale Risks:** Risks that may have an impact on the timeframes or milestones established for projects.
- **Quality Risks:** Risks that may have an impact on the quality of our performance, including product manufacturing, human resources, allocation of resources, and the adequacy or inadequacy of those.
- **Third-party related Risks:** Risks that may have an impact on our relationships with clients, partners, and suppliers.
- **CSR/ESG and Reputational Risks:** Risks that may have an impact on the Environmental, Social and Corporate Governance aspects of the organization, damaging the reputation and/or image of Gransolar.

All identified risks are classified based on their level of criticality and possibility of occurrence. The risk identified as our most critical are:

- Solar component manufacturing processes in regions with a high risk of forced labour.
- Subcontracting of labour in countries with weak labour regulation.
- Ancillary subcontracted services such as security, cleaning and maintenance.
- Employment of migrant and low-skilled workers.
- Employment of workers earning minimum wage or close to it.

All these risks are linked to our dependence on China for our supply chain. Supply chains based on electronic devices or metal structures are very dependent on China. This is due to the large amount of natural resources, such as minerals, China has. This, along with the fact of a cheap workforce and the lower standards on human and labour rights, place China above the rest of geographical markets for competitiveness.

During the reporting period, GRS has implemented a number of concrete measures aimed at strengthening its commitment to human and labour rights throughout its supply chain:

1. First, the Supplier Code of Conduct was adopted, which expressly prohibits practices such as forced, bonded or child labour. This code sets out the fundamental principles that should guide the conduct of all the company's business partners, ensuring that operations are aligned with the highest ethical standards.
2. Due diligence principles were also defined, which apply transversally to the entire supply chain. These principles aim to identify, prevent and mitigate any risk associated with human rights violations through structured assessment and monitoring procedures.
3. As part of these actions, specific contractual clauses have been incorporated that oblige suppliers to respect human and labour rights, establishing clear consequences in the event of non-compliance. In addition, risk assessments are carried out based on criteria such as country of origin, sector of activity and type of supplier, allowing for a more precise approach adapted to the particular characteristics of each business relationship.
4. To reinforce these mechanisms, GRS has developed internal training programmes for its team, with the aim of raising awareness of human rights, as well as training in the identification of potential risks and the correct application of the principles of social sustainability.
5. Aware of the importance of these actions, Gransolar has set up a supplier monitoring and control system to prevent any form of modern slavery. In this context, the Board of Directors reviewed and approved a Purchasing Policy and Procedure aligned with the requirements of the ISO 20400 standard on sustainable purchasing. These documents set out the supplier approval and evaluation processes, considering not only environmental, but also social and governance criteria.

These requirements underline the importance of complying with the Gransolar Code of Conduct, as well as the Supplier Code of Conduct, both of which explicitly prohibit child labour and other practices contrary to fundamental rights. With this comprehensive vision, GRS consolidates a responsible business model based on sustainability, transparency and unrestricted respect for human rights.

5. CONSULTATION

5.1. Statement development

The development of this statement was led by our Corporate Social Responsibility team, which consulted directly with key functions across the group to draft the statement. The draft of the statement was reviewed by the Corporate Social Responsibility Department and approved by the Board of Directors. As the US and UK legislation states, the statement is accessible in Gransolar's corporate webpage (www.gransolar.com) and publicly registered in the Australian Border Force.

5.2. Consultation with reporting entities

This statement was reviewed and approved by the Board of the organization with decision-making power over the reporting entities. This consultation process included direct meetings to discuss modern slavery reporting and underlying risk management.

5.3. Additional consultation, including with owned and controlled entities.

In addition to the specific consultation with reporting entities outlined above, this statement was developed through an extensive cross-functional consultation process which encompassed engagement with Directors of owned and controlled entities.

6. APPENDIXES

6.1. Reporting Entities

COMPANY	ACTIVITY	LOCATION	ID NUMBER
Deeptrack, S.L.U.	R&D&I	SPAIN	B85693224
Energy Storage Solutions, S.L.U.	-	SPAIN	B87821880
GRS.Construccion de Proyectos, S.L.U.	Construction	SPAIN	B87038394
GRS.Desarrollo de Proyectos, S.L.U.	Business development	SPAIN	B76585827
GRS.Investment, S.L.U.	Business development	SPAIN	B87454559
GRS.OYM, S.L.U.	O&M	SPAIN	B87038345
Grupo Gransolar, S.L.U.	Corporate Services	SPAIN	B05397286
ISE Energía, S.L.U.	Engineering and Self-Consumption	SPAIN	B02441418
PV Hardware Solutions, S.L.U.	Manufacturing and Installation	SPAIN	B02467777
PV Hardware Home, S.L.U.	Engineering and Self-Consumption	SPAIN	B13810684
Construcción De Proyectos Pgrs, Lda	Construction	PORTUGAL	516143263
Gransolar Construction Australia Pty Ltd	Construction	ASUTRALIA	640 607 209
GRS Construccion Chile, Spa	Bus. Develop.	CHILE	77.190.847-0
Gransolar Desarrollo Y Construccion Mexico, S.A. De C.V.	Construction	MÉXICO	CME160413H26
Gransolar Development & Construction South Africa PTY (Itd)	Construction and Bus. Develop.	SOUTH AFRICA	4100296070
Greefspan II Om (Pty) Ltd	O&M	SOUTH AFRICA	2018 / 266951 / 07
Grs Construction Usa, Llc	Construction	USA	99-0362427
Grs Desarrollo Y Construcción SI Dubai	Construction	UAE	Ind. Lic. 775071
Grupo Gransolar Holding Chile, Spa	-	CHILE	77.038.604-7
Gransolar Sviluppo di Progetti, S.R.L	Construction	ITALIA	14808571005
Jasper Om (Pty) Ltd	Maintenance	SOUTH AFRICA	2019 / 537523 / 07
Lesedi Om (Pty) Ltd	Maintenance	SOUTH AFRICA	2020/172392/07
Letsatsi Om (Pty) Ltd	Maintenance	SOUTH AFRICA	2020/172415/07
PV Hardware LLC	Manufacturing and Installation	USA	45-1803481
PV Hardware Middle East Ltd	Manufacturing	KINGDOM OF SAUDI ARABIA	CR4030400685
PV Hardware Solutions SL Dubai Branch	Installation	UAE	Ind. Lic. 776409
PV Hardware South Africa (Pty) Ltd	Installation	SOUTH AFRICA	9738248187
PV Hardware Turkey Donanim Teçhizat Ticaret Anonim Şirketi	Installation	TURKEY	7330889187

Planchar Hardware Solutions Private Limited	Business development	INDIA	U40200KA2021FTC156145
Gransolar Construction UK Limited	Construction and Bus. Develop.	UK	337 2154 15
PV Hardware Brasil Ltda	Installation	Brazil	50.763.649/0001-32
Gransolar Development Romania S.R.	Business development	ROMANIA	47556232
Gransolar do Brasil Construção Ltda.	Construction	BRAZIL	22.471.366/0001-81
GreenGrid Connect Pty Ltd	Construction and Interconnection	AUSTRALIA	646 007 436

6.2. United Kingdom Modern Slavery Act 2015 Criteria

Criteria	Definition	Section
Criterion 1	Identify the reporting entity or entities.	2.1
Criterion 2	Take action to identify, prevent and mitigate modern slavery in your operations and supply chains.	2.3 / 4
Criterion 3	Describe the organization and supply chain structure.	2 / 2.3
Criterion 4	Describe the Corporate Policies on modern slavery and human trafficking.	3.2 / 3.3
Criterion 5	Describe the actions taken by the reporting entity to identify, assess and address the risks.	4.
Criterion 6	Describe Actions taken to prevent modern slavery (and measurement against performance indicators, if relevant).	3.2 / 3.3 / 4
Criterion 7	Group statements will need to identify every entity within the remit of the UK Act, or within the remit of the Group.	2.1

6.3. Australian Modern Slavery Act 2018 Criteria

Criteria	Definition	Section
Criterion 1	Identify the reporting entity or entities.	2.1
Criterion 2	Describe the reporting entity's structure, operations, and supply chains.	2.1 / 2.2 / 2.3
Criterion 3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	4
Criterion 4	Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes.	3.2 / 3.3 / 4
Criterion 5	Describe how the reporting entity assesses the effectiveness of these actions.	3.3
Criterion 6	Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	5
Criterion 7	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	4 / 5

6.4. *US Business Supply Chain Transparency on Trafficking and Slavery Act of 2020 Criteria*

Criteria	Definition	Section
Criterion 1	Identify the reporting entity or entities	2.1
Criterion 2	Include a disclosure whether the reporting entities have taken any measures during the year for which such reporting is required to identify and address conditions of forced labor, slavery, human trafficking, and the worst forms of child labor within the covered issuer's supply chain.	2.3 / 3.1 / 3.2 / 3.3
Criterion 3	Include a 'Policies to Address Forced Labor, Slavery, Human Trafficking, and the Worst Forms of Child Labor' section, including information describing to what extent.	3.2
Criterion 4	Grievance and remediation process	3.3
Criterion 5	Public disclosure of the statement on the Commission's website.	5.1

6.5. Supply Chain details

Grupo Gransolar S.L. Supply Chain and providers details.

Region	Suppliers
Australian Projects	-PV Modules: China -Inverters: Europe
European Projects	- PV Modules: China -Inverters: China / Europe
North American Projects	- PV Modules: NA -Inverters: Europe

PV Hardware Solutions S.L. Supply Chain and providers details.

Region	Suppliers
Australian Projects	-Metal Structures: China & Spain -Electronic: China -Plastic: Spain. -Fasteners: China -Motors & Slew Drives: China
European Projects	-Metal Structures: Spain -Electronic: China -Plastic: Spain. -Fasteners: Spain -Motors & Slew Drives:
North American Projects	-Metal Structures: Spain/Saudi -Electronic: China -Plastic: Spain. -Fasteners: Spain -Motors & Slew Drives: China
South American Projects	-Metal Structures: Spain / Saudi -Electronic: China -Plastic: Spain -Fasteners: Spain -Motors & Slew Drives: China
South African Projects	-Metal Structures: South Africa -Electronic: China -Plastic: Spain. -Fasteners: South Africa -Motors & Slew Drives: China
Middle East Projects	-Metal Structures: Saudi Arabia -Electronic: China -Plastic: Spain. -Fasteners: Spain/China -Motors & Slew Drives: China
Indian Projects	-Metal Structures: India -Electronic: China -Plastic: Spain -Fasteners: China/India -Motors & Slew Drives: China

The Board of Directors of Grupo Gransolar, S.L. on May 28th, 2025, and in compliance with the requirements established in the 2015 United Kingdom Modern Slavery Act, 2018 Australian Modern Slavery Act, and 2020 US Business Supply Chain Transparency on Trafficking and Slavery Act, proceeds to formulate the Modern Slavery Statement, related to the period from January 1st to December 31st, 2024.

The aforementioned Modern Slavery Statement is signed below by the CEO of Grupo Gransolar, S.L., on behalf of the Board of Directors, and endorsed by the Deputy Secretary of the Board on all pages.

A handwritten signature in black ink, appearing to read 'Iván Higuera Rivas', written over a horizontal line.

D. Iván Ernesto Higuera Rivas
CEO Grupo Gransolar, S.L

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