

Policies and Statements

2026 MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

(Section 54, Modern Slavery Act 2015)



Executive Summary

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by Climate Impact Partners and its subsidiaries (together, the “Group”) during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking in our business and supply chains.

Modern slavery is a violation of fundamental human rights and includes slavery, servitude, forced or compulsory labour, child labour and human trafficking. We maintain a zero-tolerance approach to modern slavery and are committed to acting ethically, responsibly and with integrity in all our business relationships.

This statement builds on our prior disclosures and reflects enhancements made during 2025 to our third-party standards, due diligence processes, monitoring and governance arrangements.

Our Organisation, Business & Supply Chains

Climate Impact Partners is a service provider, project developer and retailer in the climate action sector. We work with businesses, project partners and suppliers globally to deliver high quality climate solutions. The Group's operations span the United Kingdom, the United States, Kenya, India and multiple jurisdictions across Latin America, Africa and Asia. Our supply chain primarily comprises professional services providers, project developers, certification bodies, auditors, consultants, technology providers and other third-party suppliers. We do not manufacture physical goods.

Our project development and delivery activities represent the areas of highest inherent modern slavery risk within our supply chain, and we have prioritised our due diligence and monitoring efforts in these geographies accordingly.

Policies & Standards

We have established and maintain a framework of policies to prevent modern slavery and human trafficking, including:

- a Code of Ethical Business Conduct;
- an Anti Slavery Policy; and
- a Supplier Code of Conduct, updated and implemented during 2025.

Our Supplier Code of Conduct sets out mandatory minimum standards for all suppliers, contractors, subcontractors and project partners. It covers human rights and labour standards, including prohibitions on forced labour, child labour and human trafficking, and requires compliance with applicable laws and internationally recognised standards.

Suppliers are expected to cascade these standards throughout their own supply chains, maintain appropriate controls (including whistleblowing mechanisms), and cooperate with audits, monitoring and remediation where required.

All relevant policies are reviewed periodically and communicated internally and externally as part of onboarding and contracting processes. Our policies consider relevant international standards, including ILO Conventions and the UN Guiding Principles of Business and Human Rights (UNGPs).

Risk Identification, Assessment & Mitigation

In line with international guidance, we seek to identify and assess modern slavery and forced labour risks that may arise in our own operations and in our supply chains.

Our approach prioritises risks based on factors such as:

- geographic location;
- sector and activity type;
- labour intensity; and
- the nature of third-party relationships.

We focus primarily on Tier 1 and Tier 2 suppliers and project partners, recognising current limitations in visibility beyond these levels. The absence of identified risks does not necessarily indicate an absence of risk.

Where risks are identified, we seek to prevent and mitigate potential adverse impacts through proportionate measures, which may include:

- contractual commitments to our Supplier / Third Party Code of Conduct;
- targeted due diligence or enhanced review;
- engagement with suppliers and project partners to encourage improved practices; and
- remediation or disengagement where appropriate.

These measures are applied on a case-by-case basis, taking into account leverage, severity and practical feasibility.

Due Diligence & Risk Management

We operate a risk based due diligence framework designed to identify, assess and mitigate modern slavery risks in our operations and supply chains. During 2025, we strengthened this framework by embedding it more systematically across third party onboarding and lifecycle management.

Our due diligence measures include:

- Know Your Counterparty (KYC) screening of suppliers and project partners;
- assessment of country, sector and activity based modern slavery risk indicators;
- review of adverse media, allegations and other credible sources relating to human rights abuses;
- contractual commitments requiring compliance with our Supplier Code of Conduct; and
- escalation, remediation and, where necessary, disengagement processes.

We recognise that an absence of identified risks does not necessarily indicate an absence of risk and remain committed to continuous improvement in our approach. We also apply responsible recruitment principles in our own operations.

Training & Reporting

We promote awareness of modern slavery risks across the organisation through internal policies, guidance and targeted training for relevant teams, including those involved in procurement, project development and partner engagement. We review training content at least annually to ensure that it remains current and relevant to our supply chain, and modern slavery risk.

Suppliers are encouraged to provide appropriate training to their own personnel and to maintain mechanisms for reporting concerns without fear of retaliation, in line with our Supplier Code of Conduct.

We also recognise the importance of access to grievance and reporting mechanisms. Internally, employees may raise concerns through established reporting channels. Externally, suppliers and partners are expected to maintain appropriate mechanisms and to notify us of material issues.

We assess grievance and whistleblowing cases raised and seek to respond in a manner that is reasonable and proportionate, having regard to our role, involvement and degree of influence.

Monitoring & Continuous Improvement

We monitor the effectiveness of our approach through periodic review of due diligence outcomes, supplier engagement and internal controls.

During 2025, we progressed work to develop performance indicators to assess the effectiveness of our approach, including:

- supplier compliance reviews and targeted audits;
- tracking of remediation actions where issues are identified; and
- internal review of due diligence outcomes to inform future risk prioritisation.

Where noncompliance is identified, we seek to work collaboratively with suppliers to address issues, while reserving the right to suspend or terminate relationships where remediation is not possible or appropriate.

In the coming year, we will continue to:

- embed our Supplier Code of Conduct more deeply across third party relationships;
- refine risk-based prioritisation of suppliers and project partners;
- enhance monitoring and documentation of due diligence outcomes; and
- review and update our policies to reflect evolving legal and regulatory expectations.

Governance & Responsibility

Responsibility for oversight of modern slavery and human rights risks sits with senior management, with escalation to the Board where appropriate.

Relevant functions (including legal, procurement, project development and compliance) are responsible for implementing policies and controls within their respective areas.

This governance approach reflects a risk based and proportionate model, consistent with international expectations while recognising the nature, size and complexity of the Group's operations.

International Alignment & Approval

This statement is intended to satisfy the reporting requirements of the UK Modern Slavery Act 2015 and to align, where applicable and proportionate, with comparable transparency expectations under:

- the Australian Modern Slavery Act 2018 (Cth);
- Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act; and
- emerging EU human rights and environmental due diligence frameworks, including the Corporate Sustainability Due Diligence Directive (CSDDD).

Nothing in this statement is intended to create additional contractual, legal or fiduciary obligations beyond those required under applicable law.

We will continue to monitor developments in international modern slavery and human rights due diligence legislation and will update our disclosures as required by law.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 March 2026.



Sheri Hickok,
CEO of Climate Impact Partners

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