



## **Terra-Gen, LLC Anti-Human Slavery Policy**

### **1 WHO ARE WE?**

Terra-Gen, LLC and affiliates (“Terra-Gen” or the “Company”) is a leading renewable energy developer and operator of wind, solar, and energy storage facilities in the United States, with projects located in California, Texas, and Colorado. As the demand for renewable energy is increasing, the risk of forced labor and abuse may also rise. Therefore, we recognize it as our duty to address any risk related to the presence of human slavery and trafficking.

### **2 PURPOSE AND SCOPE**

Terra-Gen is deeply committed to the elimination of human trafficking and slavery throughout its business and supply chain. The purpose of this Policy is to ensure that Terra-Gen and its supply chain comply with all applicable modern slavery, human trafficking, forced labor and child labor laws. This Policy applies to all Terra-Gen officers, directors, employees, and suppliers. It is everyone’s responsibility to help the Company comply with these laws. This statement articulates the steps the Company has taken and will continue to take to recognize and minimize the potential risk of human slavery in its business and supply chains.

### **3 POLICY**

Terra-Gen is committed to the principles of the US Trafficking Victims Protection Act (TVPA) of 2000; the Uyghur Forced Labor Prevention Act; the Australian Modern Slavery Act 2018, and any other applicable law supporting the abolition of modern slavery, human trafficking, forced labor, and child labor. Specifically, we are committed to:

1. Supporting and respecting human rights
2. Ensuring that we are not complicit with any human rights abuses
3. Upholding the elimination of all forms of forced and compulsory labor
4. Upholding the abolition of child labor
5. Eliminating discrimination in employment

We expect the Company and our employees to support this commitment and to not engage in or support any form of human slavery, including entering into business with any organization which knowingly supports or is found to be involved in human slavery of any kind.

Terra-Gen affirms that this Policy and its related procedures are designed and implemented in a manner consistent with the main internationally recognized human rights and labor standards, including but not limited to: the Universal Declaration of Human Rights (UDHR), the International Labour Organization (ILO) Core Conventions, and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

### **4 DEFINITIONS**

**Forced Labor:** Knowingly providing or obtaining the labor or services of a person through (1) threats of serious harm to that person or another person; (2) a scheme to cause the person to believe if he or she did not perform the labor that person would suffer serious harm or physical restraint; (3) means of abuse or threatened abuse of the law or the legal process.

**Human Trafficking:** The recruitment, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, debt bondage, or coercion for the purpose of subjection to involuntary servitude or slavery.



Modern Slavery: The severe exploitation of other people for personal or commercial gain.

## **5 EMPLOYEE RIGHTS AND OUR EFFORTS**

Terra-Gen respects its employees' rights to agree to terms and conditions of employment voluntarily, without coercion or fraudulent practices. Employees may not be restricted in movement and may freely terminate their employment with the Company at any time. As part of its hiring process, Terra-Gen also takes active steps to ensure that its employees are of legal working age for their position and complies with local laws for youth employment.

Terra-Gen commits to take the following active steps:

1. We will provide awareness training regarding human slavery and trafficking to applicable employees related to the US Trafficking Victims Protection Act (TVPA) of 2000, the Uyghur Forced Labor Prevention Act, the Australian Modern Slavery Act 2018, and any other applicable laws.
2. We will confirm our employee's understanding of our corporate policy and commitments through an annual Anti-Human Slavery Policy compliance certification.
3. We will inform employees about the appropriate action to take if a suspected case of human slavery is identified.
4. We will ensure all employees engaged in the procurement process are aware of and follow modern slavery procurement guidance.
5. We will also provide specific training to procurement personnel that will assist them with combatting human slavery and trafficking that they may encounter in their interactions with the supply chain.
6. We will ensure that applicable Company contract terms and conditions include appropriate language regarding human slavery prevention and are incorporated into contracts with our suppliers and third parties.
7. We will require our suppliers to comply with all applicable laws and will hold our suppliers to the same standards.
8. We will continue to drive a culture that supports combatting human slavery. We will commit to take swift, decisive, and appropriate actions if human rights violations are discovered within the Company or the supply chain, including termination of employees or suppliers.
9. We will comply with the annual reporting requirements imposed by the Australian Modern Slavery Act 2018, and any other applicable law.

## **6 VIOLATIONS OF THIS POLICY**

Terra-Gen has a zero-tolerance approach to modern slavery and human rights violations. We expect our employees to abide by this policy. Any employee who breaches this policy may face disciplinary action, up to and including termination of employment.

## **7 SUPPLY CHAIN**

Our suppliers are held to the same standards and values as our employees with respect to eliminating human trafficking and modern slavery. Accordingly, we regularly and carefully monitor our supply chains and endeavor to procure goods and services from suppliers that actively work to minimize the presence of human slavery and trafficking within their own networks.



## **8 THIRD PARTY REVIEW AND COMPLIANCE**

To mitigate modern slavery and human trafficking risks, third parties, including our suppliers, are required to complete a compliance review process. We are required to obtain sufficient information from our supplier to review the supplier's reputation and background and to conduct a risk-based assessment of that supplier and any potential human rights impact. In addition, our suppliers must certify that the materials they incorporate into our Company's products will comply with all applicable laws.

## **9 TRAINING**

We also require that our supply chain confirm awareness of and commit to adhering to the principles of the US Trafficking Victims Protection Act (TVPA) of 2000, the Australian Modern Slavery Act 2018, and any other laws that exist to combat human slavery around the world that may be applicable to the suppliers (i.e., the UK Modern Slavery Act of 2015). We support that awareness by confirming that our suppliers are aware of our intolerance of human slavery and trafficking and have adopted a similar position with regard to this issue within their own corporate structure. We provide our policy and requirements to our suppliers at the outset of the establishment of our business relationships and reaffirm our commitment to combat human slavery and trafficking annually with all entities with which we work. We may terminate any suppliers or third parties who do not comply with this policy or who engage in any misconduct in violation of this policy or applicable law.

## **10 AUDIT**

We retain the right to audit our suppliers' activities to ensure that they are in compliance with this policy. If we find that any supplier has breached this policy, we will take appropriate action, including terminating the relationship with the supplier.

## **11 REPORTING CONCERNS**

We actively work to create a culture where employees and members of our supply chain who encounter instances of human slavery and trafficking are free to report this conduct without fear of retaliation or retribution. It is not enough to simply say that we condemn human slavery and trafficking and to encourage others to do the same; we are committed to actively creating a community in which all are empowered to actively work to dismantle the systems that allow human slavery and trafficking to exist.

Any potential violations may be reported by employees or suppliers through the following avenues and in accordance with our Code of Ethics:

- Supervisor
- Human Resources Manager

In addition, our employees and suppliers may report potential violations via email to [reporting@terra-gen.com](mailto:reporting@terra-gen.com).

Terra-Gen will make every effort to maintain the confidentiality of the reports and the identity of anyone who makes a report of potential misconduct and will respect anyone who chooses to report anonymously.

## **12 CORPORATE ENDORSEMENT**



This policy will be reviewed and updated annually, as necessary. This policy has been approved, as have all corporate policies contained in the Terra-Gen Employee handbook.



### **Approval**

Permanent revisions to this policy shall require authorization by the Chief Executive Officer and Terra-Gen Board of Directors.

John O'Connor

Chief Executive Officer

10/11/25

Date Signed

### **Review and Audit Record:**

Version No.	Date	Reviewed By	Revised
1.0	10/12/23	Amy Roth	No Revisions
1.0	10/8/24	Amy Roth	No Revisions
1.1	10/9/25	Amy Roth Chief EHS Officer	Added language confirming policy complies with international standards