

Modern Slavery Act Statement 2024

Our commitment

Aperion Energy Group is a Power Development Company focused on solving energy and environmental challenges for utilities, high demand industrial, data and commercial customers. Through a Power First focus, Aperion builds each project from the standpoint of electrical energy deliverability. At Aperion, we do things right. We always act with integrity – taking responsibility for our work, caring for our people and staying focused on safety and sustainability. In alignment with our values, we are committed to respecting the human rights and dignity of individuals within our operations, supply chain and communities where we do business.

Our structure, operations and supply chain

Aperion provides a full spectrum of professional services including project development, consulting, technical, scientific, project delivery, operating services and sustainment for the government and private sector. We have and continue to operate in several countries around the world.

Risks of modern slavery in our operations and supply chains

We are committed to identifying possible modern slavery risks in our operations and supply chains. We conduct supply chain mapping and human rights risk assessments, including periodic support from third-party consultants. As a result, we update and improve our understanding of our highest risk areas for human rights and modern slavery exposure.

We have considered several factors that elevate the risk of modern slavery in our operations and supply chain, including but not limited to:

- *Sector and industry risks:* as a professional services and development company that provides solutions to a diverse range of clients, some business engagements identify us with a higher risk sector or industry, such as construction.
- *Geographic risks:* some of the countries in which we may operate have higher risks of modern slavery due to poor governance or socio-economic factors.
- *Product and services risks:* some products and services used in our supply chain may be identified as higher risk, such as services that involve manual labor or foreign migrant workers.

We are committed to continually improving our approach to identifying modern slavery risks in our supply chain and operations, including further engagement of third parties to conduct risk assessments and provide expertise on enhancing our approach.

Our actions to assess and address modern slavery risks

Policy

Aperion's Human Rights Policy details our commitment to respecting the human rights and dignity of individuals within our operations, supply chain and communities where we do business. This policy is guided by international principles including those encompassed in the United Nations Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, International Bill of Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Our Supplier Code of Conduct prohibits the use of any form of forced labor, child labor, human trafficking, and modern slavery. It includes additional requirements including those addressing freedom of association and collective bargaining, recruitment fees, fair wages, non-discrimination, grievance, provision of remedy, and access to personal identification documents. This Supplier Code of Conduct applies to all our suppliers, vendors, and subcontractors.

Due diligence

We conduct due diligence to avoid complicity in human rights abuses, and we seek to avoid causing or contributing to adverse human rights impacts through our own activities and business relationships. Supporting our Human Rights Policy, we have integrated a human rights questionnaire into our supplier prequalification process. Enhanced assessment occurs for suppliers based on risk triggers such as geography, activity type, and other risk factors such as employment of migrant workers. We conduct further due diligence based on international indices, media searches, and other indicators of supplier risk.

Contracting and certification

Our standard contracts stipulate that suppliers will comply with all applicable laws, rules and regulations including those related to human trafficking, worker welfare, and modern slavery. We also require that suppliers certify compliance with our Supplier Code of Conduct, including its human rights provisions.

Auditing and assessment

We reserve the right to conduct audits and thoroughly investigate possible non-compliance with our requirements. We strive to be prompt and fair in our investigations and, whenever possible, operate in a spirit of continuous improvement – working with suppliers to implement change within specified timeframes. Any violations of our Supplier Code of Conduct or failure to cooperate in an audit or investigation may jeopardize suppliers' business relationship with us, up to and including termination of contracts.

Training

Aperion' annual Code of Conduct training is required of all employees and includes information on our commitment to respecting human rights and dignity in accordance with the U.S. Federal Acquisition Regulation's anti-human trafficking Rule and the United Nations Guiding Principles on Business & Human Rights, as well as our expectations of employees to act in a manner consistent with our Human Rights Policy. Our training for supply management professionals includes a section on our Supplier Code



of Conduct, which includes human rights requirements. More detailed guidance is provided to employees engaged in human rights assessment during supplier prequalification. Additional modern slavery training is under review and being developed for deployment.

Our approach to assessing effectiveness

Key performance indicators

We are committed to continual improvement in managing human rights and modern slavery risk in our supply chain. To evaluate our performance, we consider both qualitative and quantitative indicators, including but not limited to those related to supplier qualification and certification, audits and assessments, training, client engagement, and external benchmarking.

As part of Aperion global transformation activities, we have initiated a company-wide review of our global procurement processes and systems. The outcome of this project will be a more consistent and automated procurement process that further strengthens internal controls while providing consistency and data visibility. We will continue to develop and refine our performance metrics as we advance in this and other improvement activities.

Reporting

We encourage our employees, suppliers and stakeholders to speak up, without retribution, about any concerns regarding human rights and modern slavery in our operations or supply chain. Please report any suspected violations of this policy and any law to Henry Gomez, CFO, Compliance at hgomez@aeprime.com

Sincerely,

Aaron Wheeler
Chief Executive Officer

Last Update / Review: February 2024