

GENERATE CAPITAL MODERN SLAVERY STATEMENT

I. INTRODUCTION

In accordance with the section 54(1) of the UK Modern Slavery Act 2015, this is the UK Modern Slavery Statement in respect of Generate Capital for the financial year 2022. It sets out the steps that are being taken to identify and minimise all forms of slavery and human trafficking within our business and our supply chains. At Generate Capital, we are fully committed to ensuring our employees and workers within our business and our supply chains are protected from modern slavery and human trafficking risks.

II. OUR BUSINESS AND STRUCTURE

Founded in 2014, Generate Capital, PBC is a leading sustainable infrastructure investment and operating platform focused on delivering affordable and reliable resource solutions for companies, communities and cities. Generate Capital builds, owns, operates and finances sustainable infrastructure assets across the energy, transportation, water, waste, agriculture and digital infrastructure markets.

Generate Capital, PBC converted from a Delaware corporation to a Delaware public benefit corporation in November 2021. Generate Capital operates out of its San Francisco headquarters as well as offices in New York, the Washington, DC area and London. As of December 12, 2022, Generate Capital, PBC has 209 employees across those offices.

III. RISK ASSESSMENT

At Generate Capital, we are committed to working to the highest ethical standards. We believe that the markets and locations in which we operate and the third parties we contract with present moderately low risk of modern slavery and human trafficking.

We are also committed to engaging with third-parties who share our values and who are equally dedicated to upholding responsible workplace practices. For Generate Capital, these third parties include our development partners (companies developing sustainability projects that Generate Capital acquires and operates), and companies in which Generate Capital acquires equity interests (both controlling and minority interests). Other suppliers include our investors and professional services firms, such as banks and accountants, site operation field services providers and office procurement suppliers. While we acknowledge potential modern slavery risks in multi-tiered, globalized supply chains, our development partners and suppliers are considered to be relatively low risk in terms of sector and geographical location of their operations.

IV. DUE DILIGENCE

We have surveyed our key direct development partners, suppliers and other large providers in our supply chains in order to ensure that they are operating in a safe environment, respectful of human rights and free from modern slavery and human trafficking. Results of the survey indicate that these providers are not aware of any circumstances that could give rise to an investigation or prosecution for any modern slavery offense. We have also received confirmation that our key providers have not been notified or placed under investigation for any modern slavery offense and have requested that they inform us of any developments in relation to modern slavery within their businesses or respective supply chains. Additionally, we undertake due diligence before appointing any new provider to address the issue of modern slavery and human trafficking during our procurement process.

V. STAFF AWARENESS

At Generate Capital, we provide relevant staff with training on modern slavery and human trafficking risks in our business and supply chains and the steps that should be taken to reduce such risks.

This Modern Slavery Statement made pursuant to section 54(1) of the UK Modern Slavery Act 2015 is approved by the Board of Directors of Generate Capital, PBC.
