

**Report Pursuant to the *Fighting Against  
Forced Labour and Child Labour in Supply  
Chains Act***

May 31, 2024

## I. About this Report

This report constitutes Cordelio Clover Holdings LP's and its subsidiaries' (listed on Appendix A hereto) ("Clover", or the "Company") first joint report on forced labour and child labour in supply chains ("FL/CL") for the financial year ending December 31, 2023, as required by Canada's new *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act").

## II. Organization and Structure

### **Business**

Clover is a renewable power developer that owns a minority in interest in over 1.3 GW of operating assets located throughout both Canada and the United States.

Clover's head office is in Toronto, Ontario.

### **Corporate Structure**

Cordelio Clover Holdings LP is an Ontario limited partnership formed under the *Limited Partnership Act* (Ontario). Cordelio Clover Holdings LP is managed by its general partner, Cordelio Clover Holdco Inc., a Canadian corporation formed under the *Canada Business Corporations Act*.

## III. Governance

Clover's Board of Directors (the "Board") serves as the governing body of the Company's general partner, Cordelio Clover Holdco Inc., providing counsel to senior management and playing a critical role in its oversight and strategic direction, pursuant to sound and ethical legal governance and financial management policies.

## IV. Supply Chains and Due Diligence

While Clover's primary procurement practices do not involve the importation of goods suspected to be at risk of FL/CL into Canada, Clover's procurement practices require suppliers to comply with all applicable laws, maintain their own policies against use of FL/CL. Accordingly, Clover believes that there is a low risk of occurrence of FL/CL in its direct supply chain activities.

Clover recognizes that there remains a risk of the use of FL/CL in the sourcing of raw materials associated with the development of photovoltaic cells ("PV") (i.e., solar panel manufacturing) and to a lesser extent, wind turbines and battery storage systems. Clover's supplier selection process includes diligence questionnaires of and independent third party guidance on the supplier's forced labor policies and practices, which are enforced through customary contractual covenants restricting FL/CL. In areas of higher risk, such as PV suppliers, Clover's selection process includes diligence of suppliers with a demonstrable track record sourcing polysilicon, a primary component in PV manufacturing, from regions not associated with FL/CL, as advised by industry recognized consultants and third party reports.

Further actions that Clover has undertaken to reduce the risk of FL/CL within the Company's existing supply chains include working with industry recognized consultants to assist in of the selection of potential suppliers with respect to these factors; developing due diligence policies

and processes for addressing risks of FL/CL; engaging with various supply chain partners on addressing the issue of FL/CL in the Company's industry. At this time, Clover has not identified any FL/CL in its activities or supply chains and therefore has not engaged in any ongoing remediation practices with respect to FL/CL.

## V. Policies

The Company is currently developing additional corporate policies specifically concerning responsible procurement, which in addition to the foregoing, will expand on specific due diligence criteria and processes concerning risks around FL/CL and future supply chain partners; evaluation metrics and processes for monitoring existing supply chain activities; applicable training for Clover personnel; and action plans and/or remediation requirements in the event of any potentially realized concerns around FL/CL.

## VI. Attestation

This report was approved by the Board of Directors of Clover as a joint report of the Company for the financial year ended December 31, 2023, in accordance with subparagraph 11(4)(b)(ii) of the Act.

I have authority to bind Clover.

Dated this May 31, 2024.



Luke Pangman

General Counsel & SVP, Transactions of Cordelio Clover Holdco Inc.

Appendix A  
Subsidiaries

1. Clover Finance Co LP
2. Clover Limited Partnership