

MODERN SLAVERY STATEMENT

vital energi information for a sustainable future

VE-POL-0007

MODERN SLAVERY STATEMENT

Policy statement: This statement has been prepared and is published in accordance with the requirements of Section 54 of the Modern Slavery Act 2015. It sets out the steps which Vital Holdings Ltd and its subsidiaries (the Company) has taken and continues to take in order to prevent and detect modern slavery and human trafficking in its own business and its supply chain, and its assessment of the respective risks.

ABOUT OUR BUSINESS

Vital Holdings Limited and its subsidiary businesses Vital Energi Utilities Limited, Vital Energi Solutions Limited and Vital Community Energi Limited (and their subsidiaries) is a UK-based private company operating in the built environment and energy sectors. We deliver innovative sustainable energy solutions for energy generation, distribution and energy demand reduction, focusing on three main areas; creating sustainable and viable means of generating and distributing energy; the management, measurement and reduction of consumption; and the long-term operation and maintenance of low or zero carbon energy infrastructure. Offering strategic and multi technology solutions, we model bespoke technical solutions based on the best carbon and energy savings for clients' projects, achieving carbon reduction targets now and in the long term.

We operate exclusively in the United Kingdom and our customers are drawn from both the public and private sphere across a wide spectrum of sectors, including healthcare, education, industrial, commercial, leisure, residential, justice and defence.

The Company is committed to transforming the energy system to net zero in an ethical and sustainable way. Our company values demand that we operate to the highest levels of ethical standards and treat all stakeholders with integrity and respect, fostering confidence that Vital is responsible company to work for, buy from, invest in and partner with. We fully support the UK Modern Slavery Act and the UN Universal Declaration of Human Rights and Associated Standards. We continue to be an accepted participant of the United Nations Global Compact (UNGC).

WE SAID WE WOULD...	THIS IS WHAT WE DID...
Instruct a third party consultant to provide direction and recommendation on the next statement we published	We contacted the Pan Lancashire Anti-Slavery Partnership, a specialised network coordinated by Lancashire Police in the local area of our headquarters in Blackburn. We demonstrated our development over FY25/26, to which they provided feedback and recommendations on how to continue to develop our exemplary modern slavery due diligence. Their recommendations have been taken on board throughout this statement.
Hold an online workshop bfor the top 80% of our supply chain spend.	In June 2026 we held an online supply chain workshop, inviting the top 80% of our subcontractor supply chain spend. We consulted with PLASP to establish workshop content and delivery. Following this workshop we have supplier lists to focus our engagement with for future events.
Conduct two site based modern slavery audits on our downstream supply chain	We created a site based audit structure and schedule, conducting two site based audits. The sites selected for audit were informed by the National Referral Mechanism and Duty to Notify Statistics UK Modern Slavery Referral Intensity Index, enabling us to identify higher- risk areas in which we operate.
We will complete modern slavery audits on the top 20% of our supply chain spend	As we continue to manage and monitor our solar supply chain, the highest upstream risk within Vital. Our focus was the development and completion of site based modern slavery audits.
Achieve 100% completion of modern slavery training and awareness on our training platform Kallidus	We achieved 98% completion of modern slavery training and awareness on Kallidus.

OUR WORKFORCE

Vital Energi's workforce is predominantly directly, permanently employed. Our head office in Blackburn, Lancashire, houses most of our support and office-based staff. We have four other offices; Glasgow, London, Hereford and Swansea as well as our Energy-from-Waste plant located in Drakelow, Burton-upon-Trent - bringing our total number of locations to six.

There is an unprecedented demand for labour in the construction industry and as a result attracting candidates for vacancies is challenging for many businesses. We understand that this creates incentives for people prepared to resort to exploitation to fill positions lower down the construction supply chain, where we have less control and less visibility over hiring practices. For indirect employees, we require labour agencies to satisfy us that all staff have written employment contracts, have not had to pay for the opportunity to work, and are legally able to work within the UK.

We do not use umbrella companies. We employ contractors in very specific circumstances. Contractors are normally highly skilled and possess a unique or rare skill-set that is required to overcome a short-term challenge. There are no significant risks of modern slavery associated with our use of contractors.

OUR SUPPLY CHAIN

Most of our supply chain spend is based in the UK, however, we do source some significant items of low carbon technology and equipment from overseas, including solar panels, CHP engines, batteries and pre-insulated pipework, mainly from Denmark, Poland, China, Germany and the USA. We recognise that as our supply chains extend beyond the UK, the level of risk increases. Where we work with overseas suppliers, we carry out detailed due diligenceto understand sourcing arrangements and the implications for our risk profile. We have long-term relationships with many of our supply chain partners and seek to use our spending power in a way that leaves a positive legacy.

DUE DILIGENCE, RISK ASSESSMENT AND MANAGEMENT

The Company's business model is to deliver an end-to-end service for the pre-development, design, build, operation and maintenance of our projects, using in-house teams. This reduces the risk of modern slavery on our projects significantly. However, we are aware that certain business activities, such as procurement of goods and materials (particularly from overseas), and the use of subcontractors and labour agencies, increases the risk of modern slavery taking place within our supply chain. To actively monitor the heightened risk to our supply chain through solar panel procurement, we have additional criteria which solar panel providers must satisfy to be an approved supplier. We monitor compliance through an interactive tracker which allows direct comparison of suppliers and live statuses of supplier certifications and expirations.

We pre-qualify our suppliers and subcontractors using vendor registration systems operated by Alcumus, called SafeContractor and SafeSupplier. As part of the onboarding process, vendors

At the end of June 2026 our headcount was **860 employees**, which breaks down as follows:

1. **Vital Energi Utilities Limited** - 743
2. **Vital Energi Solutions Limited** - 50
3. **EfW Facilities** - 74
4. **Vital Community Energi Limited** - 2

are asked to provide a copy of their most recent annual Modern Slavery Statement, as well as questions around other policies and procedures related to modern slavery. We have a number of strong local supply chains across the UK and are committed to local investment, local employment, community benefit and maximising local supply chain spend, as set out in our Social Value and Sustainable Procurement Policies. We engage with MSMEs and other local businesses through "Meet the Buyer" days, conduct desk-based research and seek independent recommendations for new suppliers. Once we have selected our supply chain for a particular project, meetings are set up between the supplier and the relevant Vital departments to confirm various aspects of the work, including our expectations regarding working practices and management of their supply chains. Each member of our supply chain has both a primary and secondary point of contact within Vital, to ensure effective communication and maximum transparency throughout the duration of the works.

Our internal working group meets on a bi-annual basis to identify any emerging risks in our supply chain, to review our modern slavery target developments and discuss areas of improvement. The working group encourages continual improvement, active risk management and regular reviews of due diligence.

OUR POLICIES

The Company maintains an Integrated Management System, comprising our externally certified ISO 9001:2015 Quality Management System, ISO 14001:2015 Environmental Management System, ISO 27001:2022 Information Security Management System, ISO 45001:2018 Occupational Health and Safety Management System and ISO 50001:2018 Energy Management System. We adhere to a comprehensive suite of policies and standards which are reviewed at least annually by our Board and signed off by the Group Chair and Chief Executive Officer. Our policies form part of our conditions of contract with Contractors and Sub-Contractors. Acceptance of our policies and standards is a pre-qualification requirement. We regularly monitor compliance with our policies and report performance figures to our operational boards and Group Board. Key policies relevant to modern slavery are described below.

POLICY	SCOPE	RELEVANCE TO MODERN SLAVERY
Modern Slavery Policy	Sets out the steps we will take to ensure that we identify, tackle and eliminate any instances of modern slavery in our supply chain	Explains to all employees, subcontractors and consultants their responsibilities in relation to modern slavery, defines our Principles of Conduct in relation to modern slavery, explains how we will tackle training and raising awareness, and explains what actions we will take to reduce risk, deal with non-compliance, remediation, reporting, & support
Sustainable Procurement Policy	Sets out the standards we expect our suppliers to work to and extend to their own supply chains	Informs suppliers of the requirement to provide information on modern slavery as part of pre-qualification checks and includes reference to national and international human rights standards and regulations, they are expected to comply with
Supplier Code of Conduct	Reviewed, updated and sent to all suppliers annually on how we expect suppliers to comply with our policies	Encourages all suppliers, regardless of size and legal requirement, to publish an annual Modern Slavery Statement, and align with the UN Global Compact principles on human rights, labour, environment and anti-corruption
Sustainability Policy	Ensures that we make ethical and sustainable decisions that create and share value for our stakeholders and wider society	Includes the principle of embedding a stakeholder-focused mindset in our business, balancing people, planet and profit over the short-, medium- and long-term, commitments to align to the UN SDGs and publish data on our performance annually
Social Value Policy	Communicates our approach to identifying, delivering and measuring social value	The Policy makes specific reference to employing fair payment practices and eradicating exploitation in our supply chain through enforcement of our Modern Slavery Policy
Whistleblowing Policy (Internal)	Sets out steps employees can take if they experience or witness wrongdoing in the workplace	Specific reference to modern slavery as an example of a concern that can be raised in confidence through our whistleblowing procedure
Anti-Bribery and Corruption Policy	Sets out the ethical, professional and legal standards we expect all internal and external stakeholders to adhere to	Sets out the duty of all employees to be vigilant in guarding against unusual activity or payments and confirms our commitment to zero tolerance of all forms of corruption
Health & Safety Policy	We are committed to preventing injury and ill health and seek to provide a safe and healthy working environment to all	A safe working environment cannot be achieved where people are working under duress. Our policy sets out the duties on employees to ensure that the behaviours we exhibit keep everyone safe and ensure that any instances, suspected or otherwise, where that is not the case are reported promptly
Equality, Diversity & Inclusion Policy (Internal)	Confirms our commitment to providing equal opportunities and promoting an inclusive, fair, and decent working environment	Recognises and respects the importance an inclusive and diverse workforce and supply chain
Recruitment Policy (Internal)	Ensures that employees have equal opportunities, the relevant rights to work and are employed in line with all local and national legislative requirements	Our recruitment checks safeguard human rights and minimise the risk of directly employing someone who is being forced to work or has been trafficked
Disciplinary Policy (Internal)	Sets out actions when employees deliberately breach the Employee Code of Conduct and other policies	All employees know what is expected of them in terms of conduct, and the consequences of misconduct
Employee Code of Conduct (Internal)	Our company code of conduct, applicable to all employees. This document sets out our values and how we expect our employees to behave when working on behalf of the company	Includes sections on discrimination, harassment, bullying and human rights and sets out Vital's commitment to zero tolerance of all forms of corruption, as well as the avenues available for raising concerns
Fair Work First Statement	Confirms our commitment to the Scottish Government's Fair Work First criteria	Describes the channels we provide to give employees an effective voice and affirms our commitment to avoid the use of zero hours contracts, pay the real Living Wage and oppose the use of fire and rehire practices
Payment Practices	Transparent overview of supplier payments and the systems in place to ensure timely, fair and efficient payment practices.	Timely payments, especially to SMEs - which constitutes most of our supply chain – reduces financial stress, suppliers under financial pressure may be more likely to resort to exploitative labour practices.

TRAINING AND AWARENESS
We continually promote openness and transparency, providing available avenues to all employees and those who work on our behalf. Our Whistleblowing Policy, Supplier Code of Conduct and Modern Slavery Policy outline processes to raise concerns of unethical or illegal behaviours.

Our Whistleblowing Policy encourages a free and open culture, supporting honesty, openness, and accountability. It recognizes that those working with or for the company may be the first to notice improper conduct and should feel empowered to speak up without fear.

We take all allegations of any type of unethical or illegal behaviour very seriously and our HR and H&S teams are trained to deal with all reported concerns sensitively and thoroughly. In the event of a complaint, we carry out independent investigations and take appropriate action. Any outcomes and findings from such investigations are reviewed at Board level.

Our employee induction programme provides training and awareness of our company mission, vision, and values as well as our policies and procedures to all new starters. In addition, we will continue to distribute and monitor modern slavery training and awareness within our internal employee base, using our training platform Kallidus, we aim to maintain a minimum 98% completion rate for new starters and recurrent training.

We encourage both our employees and suppliers to utilise the free training and resources that are available through the Supply Chain Sustainability School. This year, we have become Supply Chain Sustainability School Partners, and will use this resource to support the delivery of targeted and meaningful training to our wider supply chain and internal staff. Providing a centralised record of impact reach from encouraging awareness.

FOCUS AREAS FOR 2026/27
We commit to demonstrate continual improvement to tackling and preventing modern slavery risks within our business, supply chain and wider industry. We will continue to develop realistic targets, both enhancing our governance whilst adapting to our growing business structure and operations. The areas that we will focus on in FY26/27 are as follows:

FOCUS AREAS FOR 2026/27

KEY PERFORMANCE INDICATORS

- Complete four site audits across the financial year.
- Achieve two audits of suppliers in the upstream value chain.
- Host supplier workshops to achieve a 35% reach of our supply chain.

CONTINUAL IMPROVEMENT

- Commitment to report on the modern slavery / rights to work incident rates in future reports for full transparency.
- Add modern slavery awareness materials to site set up packs, including inforamtion poster and subcontractor induction slides.

ADAPTING FOR THE FUTURE

Complete modern slavery materiality assessments for subsidiaries (EfW, Vital Community Energi), to provide entity specific targets in the FY27/28 statement

BOARD APPROVAL
This policy statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Vital's slavery and human trafficking statement for the financial year ending 30 June 2026. This statement has been approved by the Chairman, Chief Executive Officer and ESG Director.

Gary Fielding
Chairman
Date: October 2026

Ian Whitelock
CEO
Date: October 2026