



# MODERN SLAVERY POLICY

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## MODERN SLAVERY POLICY

**Policy statement:** Modern slavery is the illegal exploitation of people for personal or commercial gain, and involves people being coerced and forced into providing a service to others. It is a serious and organised crime that destroys lives. People of all genders, ages (including children) and ethnicities can be victims of modern slavery and it is a violation of fundamental human rights. Vital Holdings Limited and its subsidiaries and associated companies (the Company) adopt a zero-tolerance approach to modern slavery and human trafficking, and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts.

### POLICY PURPOSE

The Company believes that everyone has a right to be treated with dignity and respect at all times, and in all circumstances. We recognise that as a business with a large and complex supply chain, there is a risk people are being exploited to provide the goods and services we procure, and that risk increases when our supply chain extends beyond the UK. Whilst we do not tolerate abuse within our direct business activities, we must take steps to ensure that we identify and tackle any instances of modern slavery in our supply chain.

The purpose of this policy is to provide a framework to ensure:

- ▶ All Company employees, subcontractors and consultants understand and are aware of their responsibilities in relation to modern slavery and the broader human and labour rights topics identified as material to our business
- ▶ The development of a strategic approach to identifying and tackling any modern slavery within our supply chain
- ▶ The implementation of robust, transparent and proportionate governance and assurance processes
- ▶ Reporting of the steps we have taken to ensure there is no modern slavery in our business or supply chain and any instances (or concerns) of modern slavery, in accordance with the Modern Slavery Act 2015 and its accompanying guidance, by publishing an annual Modern Slavery Statement

This is one of a suite of policies intended to communicate our values and standards to all stakeholders, fostering confidence that Vital is a responsible company to work for, buy from, invest in and partner with. This policy is owned by the Managing Directors with ultimate oversight resting with the Vital Group Board, including the approval of any changes to the policy.



### HUMAN RIGHTS COMMITMENTS AND MATERIAL TOPICS

In discharging its commitment to ethical business practices and in alignment with the UN Global Compact (UNGC) Principles 1 and 2 on Human Rights, the Company has identified the following as material human and labour rights topics connected to our operations and value chain:

<b>1</b>	<b>Freedom of association and the right to collective bargaining</b>	<b>7</b>	<b>Right to a clean and healthy environment:</b> pollution, water, air and land
<b>2</b>	<b>Child Labour</b>	<b>8</b>	<b>Working Hours</b>
<b>3</b>	<b>Forced Labour</b>	<b>9</b>	<b>Gender Equality and Women's Rights</b>
<b>4</b>	<b>Non-discrimination in respect of employment and occupation</b>	<b>10</b>	<b>Rights of vulnerable groups and minorities</b>
<b>5</b>	<b>Safe and Healthy Working Environment</b>	<b>11</b>	<b>Digital Security and Privacy</b>
<b>6</b>	<b>Fair Wages</b>	<b>12</b>	<b>Raw Material Sourcing</b>

Of these twelve topics, the Company considers the following six to be most material to our direct operations and value chain, representing areas over which we have the greatest influence and direct responsibility:

**Safe and healthy working environment** – fundamental to our construction and energy services operations, where workers are regularly exposed to physical risk.

**Fair wages** – relevant across our directly employed workforce and supply chain, where labour exploitation risk is heightened.

**Working hours** – directly controlled in our employed workforce; monitored in supply chain through pre-qualification and audit.

**Gender equality and women's rights** – a priority in an industry where women remain significantly under-represented at all levels.



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### Right to a clean and healthy

**environment** – central to Vital Energi's purpose of delivering low-carbon infrastructure and directly connected to the communities we serve.

**Raw material sourcing** – a heightened risk given international supply chains for solar PV, steel, aluminium, and heat interface unit components. The table below summarises all identified material topics, their relevance to Vital Energi's operations, and their materiality tier.

### ROLES AND RESPONSIBILITIES

The prevention, detection and reporting of modern slavery in any part of our business and supply chain is the responsibility of all those working for us or on our behalf. The Company conducts regular modern slavery risk assessments across its operations and supply chain. These assessments consider sector, geography, supplier type, and workforce characteristics to identify areas of heightened vulnerability. High-risk suppliers are flagged for enhanced due diligence and monitoring. Certain individuals within the business have specific responsibilities in relation to preventing modern slavery and human trafficking:

- › **HR Director** | Employment policies, candidate vetting, staff awareness & training.
- › **ESG Director** | Sustainability policies, KPI setting, monitoring & reporting.
- › **Commercial Directors** | Supply chain policies, vetting, compliance monitoring.
- › **HS Director** | Risk assessments, internal assurance & external audit

### PRINCIPLES OF CONDUCT

The Company requires all organisations with whom it is engaged to operate to the highest level of ethical standards and to hold their own suppliers to the same high standards. Suppliers are expected to ensure that their goods, services, materials and labour-related supply chains fully comply with the Modern Slavery Act 2015 and the material human rights standards set out in this policy.

### Materiality Tier and Relevance

Material Topic	Relevance to VE	Materiality Tier
Freedom of association & collective bargaining	All operations & supply chain	Standard
Child Labour	Supply chain, particularly international	Standard
Forced Labour	Supply chain, particularly international	Standard
Non-discrimination in employment & occupation	Direct operations	Standard
Safe & healthy working environment	Direct operations construction, energy	Most Material
Fair Wages	Direct operations & supply chain	Most Material
Working Hours	Direct operations & supply chain	Most Material
Gender equality & women's rights	Direct operations	Most Material
Digital Security & Privacy	Direct operations	Standard
Right to clean & healthy environment	Operations, value chain & communities served	Most Material
Rights of vulnerable groups & minorities	Supply chain workforce	Standard
Raw Material Sourcing	Supply chain – solar PV, steel, HIUs	Most Material

### SUPPLY CHAIN DUE DILIGENCE

In accordance with our Sustainable Procurement Policy, the Company requires our supply chain partners to be vetted through the Alcumus SafeSupplier or SafeContractor databases, or provide sufficient information directly to us to enable us to verify that the supplier meets our values and standards.

The Company carries out detailed supply chain mapping to ensure that we understand our supply network as comprehensively as possible. All supplier contracts include clauses prohibiting forced labour and requiring compliance with the Modern Slavery Act. Suppliers are required to complete pre-qualification questionnaires covering labour practices, recruitment methods, and subcontracting arrangements.

### FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Vital Energi and its supply chain partners are expected to respect workers' rights to freedom of association and the right to collective bargaining, in accordance with ILO Conventions 87 and 98. Where legal restrictions exist in a given jurisdiction, suppliers must enable alternative means of worker representation and genuine dialogue between workers and management. This right shall not be impaired either in our directly employed workforce or within our extended supply chain.



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### FAIR WAGES AND WORKING HOURS

The Company is committed to ensuring that all directly employed workers receive fair, legal wages that meet or exceed applicable minimum wage requirements. In the UK context, this means compliance with National Living Wage legislation as a floor, not a ceiling. Vital Energi supports the principles of fair pay and reasonable working hours and expects the same from supply chain partners. Supplier pre-qualification questionnaires include assessment of wage payment practices, payroll transparency, and working hour management.

### GENDER EQUALITY AND VULNERABLE GROUPS

The Company recognises that certain groups face heightened risk of exploitation and discrimination, including women, migrant workers, young workers, and those in precarious employment. Our recruitment, employment, and promotion practices reflect a commitment to non-discrimination and equal opportunity regardless of gender, ethnicity, disability, age, or other protected characteristic.

As an employer in the construction and energy services sector, Vital Energi acknowledges the persistent under-representation of women and actively works to address structural barriers to gender equality through our People & Culture strategy. These same expectations are extended to our supply chain through contractual obligations and supplier assessments.

### RIGHT TO A CLEAN AND HEALTHY ENVIRONMENT

Consistent with our purpose of delivering low-carbon infrastructure and our commitments under our Environmental Policy, the Company acknowledges the internationally recognised right of workers and communities to a clean, healthy and sustainable environment. We embed environmental standards into supply chain requirements and assess suppliers' environmental management

capabilities as part of due diligence, recognising that poor environmental governance and labour exploitation are frequently co-occurring risks.

### ENHANCED DUE DILIGENCE AND HIGH-RISK SOURCING

Suppliers who provide goods or services deemed to be at particular risk of modern slavery or human rights violations will be subject to enhanced due diligence. High-risk categories identified within Vital Energi's supply chain include, but are not limited to:

- ▶ Solar PV panels and components – due to the risk of forced labour in polysilicon production, particularly in the Xinjiang region
- ▶ Heat interface units and associated components – sourced from international manufacturers, requiring supply chain transparency to sub-tier level
- ▶ Steel and aluminium – smelting and extraction supply chains carry heightened labour risk in certain source countries
- ▶ Labour-intensive installation subcontracts – particularly where migrant labour is involved
- ▶ Battery Energy Storage Systems (BESS) rare earth elements and components - elevated risk of labour rights abuses and poor environmental practices in mining and processing supply chains (e.g. lithium, cobalt, nickel), particularly in high-risk regions, requiring enhanced transparency to sub-tier suppliers

Such suppliers can expect to be asked detailed questions designed to help us assess their capacity to manage and prevent modern slavery risks, and to identify opportunities to work in partnership to improve protections. The Company reserves the right to conduct audits, either during onboarding or on an ad hoc basis for existing suppliers. We acknowledge that suppliers may be at different stages of their journey towards more ethical supply chains; however, we expect recognition of the issue and demonstration of continuous improvement.

### AWARENESS AND TRAINING

The Company will raise awareness of this policy, and of the dangers of modern slavery and human rights abuses, by publishing the policy on our website and company intranet and notifying all staff and our supply chain that it should be read.

We will look for opportunities to raise awareness of modern slavery, human rights, and the specific material topics identified in this policy during the course of our normal business activities. Appropriate training and guidance will be provided, particularly for commercial and procurement staff, human resources staff and any staff involved in due diligence or auditing. General staff training will be made available, including how to spot the signs of modern slavery and the procedures to follow to ensure that suspected instances are handled correctly. Training will be extended to cover the broader human and labour rights topics identified in this policy, with particular focus on the six most material areas. We will maintain records of all members of staff and suppliers who have completed modern slavery and human rights training.

### ASSURANCE AND TRANSPARENCY

Vital Energi has committed to implementing systems and controls aimed at ensuring that modern slavery and human rights abuses are not taking place anywhere within our direct operations or supply chain. We take a risk-based approach to procurement, contract management, and supply chain management, informed by the material topics and risk categories identified in this policy.

This policy will be accompanied by our annual Modern Slavery Statement, published each financial year, which will include details of activities undertaken by the Company to combat modern slavery and promote ethical labour standards in our business and supply chains. The Modern Slavery Statement will be published on our website within 6 months after the last financial year end.



## MODERN SLAVERY POLICY

### NON-COMPLIANCE, REMEDIATION, REPORTING AND VICTIM SUPPORT

If any Company employee is found to have breached this policy, appropriate action will be taken in line with our disciplinary procedures. If any supplier is found to have breached this policy, appropriate action will be taken on a case-by-case basis, which may range from requiring remediation to terminating agreements.

Remediation efforts will be guided by the UN Guiding Principles on Business and Human Rights and will prioritise the safety, dignity, and support of affected individuals. Where appropriate, we will collaborate with external experts to ensure effective and ethical remediation. We will also conduct internal reviews and apply lessons learned, including enhanced training for our staff where required.

Individuals who have reasonable suspicion or evidence of non-compliance with this policy or the Modern Slavery Act are encouraged to report their concerns, either in accordance with the Company's Whistleblowing Policy or directly to their line manager, the HR Director, ESG Director, or HS Director.

### REPORTING

Our reporting framework is designed to assess, communicate, and continuously improve our efforts across modern slavery and broader human rights commitments. It includes robust mechanisms for risk assessment, due diligence, and the implementation of effective mitigation strategies. By regularly disclosing our initiatives, we enhance internal accountability and engage stakeholders — including employees, customers, and investors — in our collective pursuit of ethical business practices. Our reporting framework includes the following performance indicators:

- ▶ Percentage of suppliers assessed for modern slavery and human rights risks

- ▶ Number of employees and suppliers trained annually, including on the six most material human rights topics
- ▶ Number of reported concerns and resolution outcomes
- ▶ Coverage of enhanced due diligence across high-risk supply categories
- ▶ Progress against gender equality targets in our workforce
- ▶ Frequency of policy reviews and updates

Any information that could lead to the identification, discovery and recovery of victims of modern slavery or human trafficking in the UK **should be reported** through one of the below options:

1

Via the Modern Slavery Helpline on **0800 121 700** (open 24 hours a day, 365 days per year)

2

or online at **[www.modernslaveryhelpline.org](http://www.modernslaveryhelpline.org)**

### CONTINUAL IMPROVEMENT

The Company is wholly committed to ensuring the continual improvement of our ethical business practices. We commit to setting and reviewing targets across the material human rights topics identified in this policy and reporting on progress annually. Vital Energi's Modern Slavery Policy applies globally across all operations, subsidiaries, contractors and suppliers. We expect all business partners to uphold these standards regardless of jurisdiction. Our approach is informed by international frameworks including:

- ▶ ILO Core Conventions on labour rights
- ▶ UN Guiding Principles on Business and Human Rights
- ▶ UN Global Compact Principles 1-6 (Human Rights and Labour)
- ▶ Ethical Trading Initiative Base Code

As part of our commitment, we will communicate this policy to all employees and organisations working on our behalf and ensure the latest version is available on our website for interested parties to view openly. This policy will be reviewed at least annually.

### BOARD APPROVAL

This policy is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Vital Energi's slavery, human trafficking, and human rights policy for the financial year ending 30 June 2026.

This policy has been approved by the Chairman and Chief Executive Officer.

**Gary Fielding**  
Chairman  
Date: June 2026

**Ian Whitelock**  
CEO  
Date: June 2026