ANESCO INFORMATION



Anesco - Modern Slavery website Statement

At Anesco we are committed to acting ethically and with integrity and transparency in all business dealings, which includes playing our part in eradicating modern slavery, and to. Being responsible is one of Anesco's core values, and these values, together with our mission to accelerate the transition to a sustainable future, form the basis for behaviour and decisions made across Anesco.

This statement, which is made pursuant to section 54 of the Modern Slavery Act 2015, constitutes our modern slavery statement for the financial year ending 31 March 2025 (FY25). It sets out the steps taken by Anesco Limited and its subsidiaries (which together are referred to in this statement as "Anesco"), to prevent modern slavery and human trafficking in our operations and supply chains.

This statement was approved by the board of directors of Anesco Limited on 9 September 2025.

Signed by Hildagarde McCarville, CEO, Anesco

-Signed by:

9 September 2025

Hildegarde McCarville

Organisation Structure

At Anesco we operate within the UK and Europe to design, construct, operate, maintain and optimise high performing renewable energy projects. We also install energy efficiency measures in residential homes in the UK to help lift people out of fuel poverty.

Our People

Anesco employs approximately 220 people, the vast majority of whom are employed in the UK, with operations in the Netherlands, Germany, Denmark, Belgium and Ireland. We also employ contractors in the UK as installation partners for our energy efficiency business, and in the UK, Denmark, Belgium, Ireland and the Netherlands for our renewable energy development, construction and maintenance business. Anesco does not employ seasonal workers.

Anesco conducts robust checks on any new employee, including eligibility to work in the UK or Europe (as applicable), to safeguard against human trafficking or individuals being forced to work against their will. When employing contractors that operate via a business, we contract with registered companies only.

Our Policies in relation to Slavery and Human Trafficking

At Anesco we are committed to implementing and enforcing effective systems and controls to ensure no modern slavery or human trafficking is taking place anywhere in our own business, and taking all reasonable efforts to ensure the implementation and enforcement of effective systems and controls to ensure no modern slavery or human trafficking is taking place in any of our supply chains. We seek to reflect this in the following policies:

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- Our Anti-Slavery and Human Trafficking Policy, which sets out our commitment to acting ethically and with integrity in all our business dealings and relationships, and encourages employees, contractors, agents and other team members to raise concerns about any issue or suspicion of modern slavery at the earliest possible stage.
- Our Whistleblowing Policy, which reassures team members that they can raise any concerns that they might have without fear of reprisal and explains how to report a whistleblowing concern.
- The Anesco Supplier Code of Conduct, which sets out our expectations of our third party suppliers, including the commitment we expect from them to act ethically and with integrity.
- Our Supplier Onboarding Policy (Pre Qualification Questionnaire), which requires our third party suppliers to commit to the Anesco Supplier Code of Conduct.

In addition to the above, all Anesco employees are expected to demonstrate our business values, which include being responsible, safe and green.

Due Diligence Process and Risk Assessment for Slavery and Human Trafficking

Anesco contracts with hundreds of suppliers in any given year. Our energy efficiency installation business works with a UK based supply chain. In relation to our renewable energy project construction and O&M business lines, we often source component equipment for our solar and battery projects in particular (including, for example, solar PV panels, battery containers, transformers and inverters) from outside the UK and Europe. These items are sometimes procured directly by Anesco from the manufacturer, and sometimes procured through a third-party organisation which liaises directly with the relevant manufacturer. We also employ sub-contractors on our construction sites, who themselves sometimes sub-contract construction work to third party organisations.

Supplier questionnaire and statements

In a questionnaire that is completed by new suppliers we request a copy of the supplier's anti-slavery and human trafficking policy, and ask our suppliers to confirm that they hold their own suppliers to equivalent standards as those set out in Anesco's anti-slavery and human trafficking policy. The responses to these, and any resulting follow-up, questions are used to identify and mitigate risks relating to slavery and human trafficking in our supply chains.

We have sometimes, at the request of our customers, obtained from suppliers a standalone statement that they and their suppliers have a zero-tolerance position towards modern slavery and human trafficking.

Contractual requirements

Our standard procurement documents include prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, through a requirement to comply with the Modern Slavery Act 2015.

Audits

We had a goal to complete 25 "deep dive" reviews on our suppliers during FY25. We extended this goal into a wider Supplier Performance Programme, holding face-to-face meetings with 30 suppliers across Tiers 1, 2, and 3 to discuss their performance across a range of factors. These suppliers were selected based on spend and risk criteria, and the meetings included a site visit to one key supplier in

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China. The agenda for the Supplier Performance Programme meetings included discussions on modern slavery, and no issues of concern were identified.

We also held our annual Supplier Day in October 2024, bringing together key suppliers to engage in meaningful discussions around risk management and related topics.

Training

In FY25, members of the Procurement team who are involved in the supplier onboarding process undertook enhanced training on modern slavery. This training was designed to deepen their understanding of modern slavery issues and equip them with the knowledge needed to identify and address potential risks within the supply chain.

We do not currently provide training to other employees on modern slavery; however, all employees are taken through our policies, including our Anti-Slavery and Human Trafficking Policy, as part of their induction.

KPIs

During FY26, we expect to continue to hold executive-level performance meetings with our key suppliers, and complete further ad hoc compliance checks, including questions regarding modern slavery policies and practices. If we verify gaps in the controls of any of those suppliers, we will develop action plans with them to remedy those gaps. We also intend to repeat our Supplier Day.

Support for industry initiatives

In FY25, Anesco continued its involvement in the Responsible Sourcing working group led by Solar Energy UK (SEUK), which it joined in FY24, actively supporting this vital initiative and taking proactive measures to advance environmental and social responsibility across the industry. We will continue this involvement during FY26.