Modern Slavery Act



Policy Statement

Introduction

This statement sets out nexos' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 January 2024 to 31 December 2024.

As part of the energy transition and as a good employer in the region, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Our organisation is committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Responsibility

Responsibility for our anti-slavery programme is as follows:

- Policies: implementation, review and compliance will be owned by Human Resources, Business Services, for the purposes of supply chain in particular, and Quality. Policies are created by the subject matter expert and audited by the Quality team on a regular basis as defined at the start of the financial year.
- **Risk assessments:** A quarterly review at business level including risk related to modern slavery and trafficking at all levels of the organisation and through all functions.
- **Training:** the onboarding programme includes online training relating to our code of business conduct, anti-bribery and corruption, and whistleblowing which support the consistent education of our teams on our modern slavery and trafficking expectations.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations [select the relevant policies from the list below and include links to the full text]:

- Whistleblowing policy We encourage all our workers, customers and other business partners to
 report any concerns related to the direct activities, or the supply chains of, our organisation. This
 includes any circumstances that may give rise to an enhanced risk of slavery or human
 trafficking. Our whistleblowing procedure is designed to make it easy for workers to make
 disclosures, without fear of retaliation. Employees, customers, or others who have concerns can
 contact HR confidentially.
- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supplier code of conduct We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve

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their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship

Recruitment & Selection policy We use only specified, reputable employment agencies to source
labour and always verifies the practices of any new agency it is using before accepting workers
from that agency. As with all providers via our supply chain, we verify compliance with our
standards prior to engaging and on a regular basis.

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier [this may be part of a more general human rights or labour rights assessment];
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- conducting supplier audits or assessments through the organisation's own Quality function, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- creating an annual risk profile for each supplier.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through audit and requiring implementation of action plans.

This statement has been approved by the Leadership, who will review and update it as necessary on an annual basis. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the nexos Slavery and Human Trafficking Statement for the financial year ending 2024.

Derek Thomson

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Chief Operating Officer

Nexos

May 2025