

# Modern Slavery and Human Trafficking Statement 2025

## Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1<sup>st</sup> June 2024 to 31<sup>st</sup> May 2025.

The statement sets down Cobalt Energy Group’s commitment, under the Modern Slavery Act 2015, to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and in our supply chains.

## 1. Organisational structure and supply chains

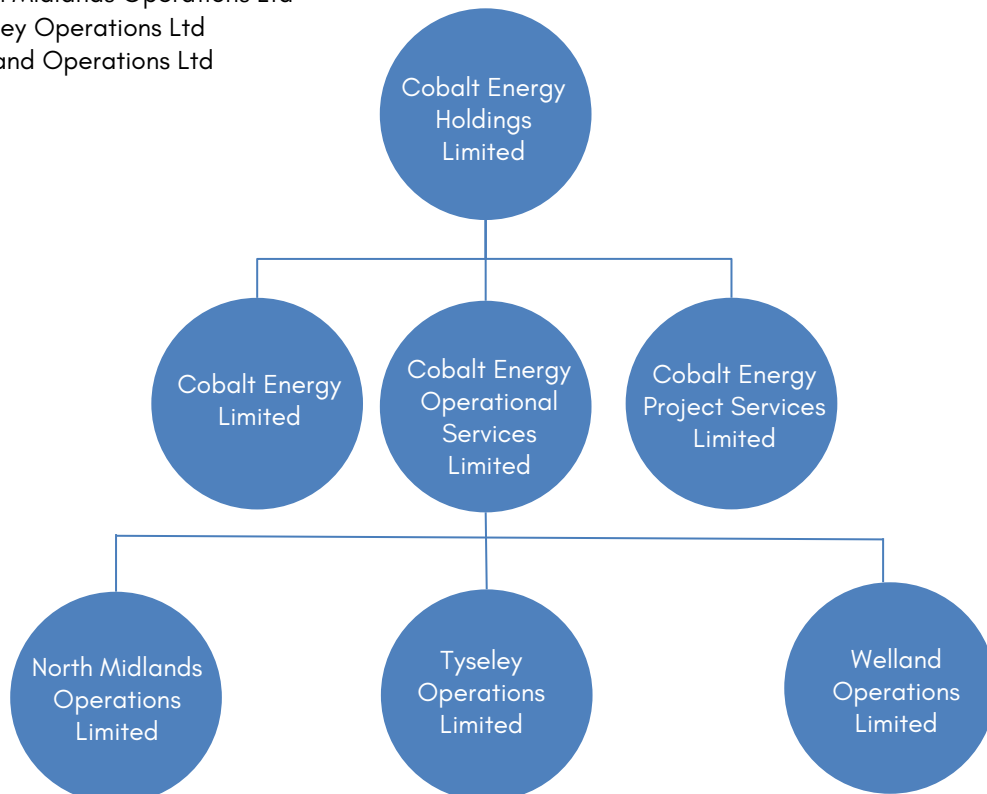
This statement covers the business activities of the Cobalt Energy Group, which are the provision of project management, engineering, operation and maintenance services within the utilities, renewables and waste sectors.

### a) Organisational structure

During the 2024–2025 financial year, the company achieved a revenue of £41.8 million and employed 170 people.

For this statement, Cobalt Energy Group includes:

- Cobalt Energy Ltd
- Cobalt Energy Project Services Ltd
- Cobalt Energy Operational Services Ltd
- North Midlands Operations Ltd
- Tyseley Operations Ltd
- Welland Operations Ltd



The Cobalt Group is based exclusively within the United Kingdom. It operates within the engineering consultancy, construction and waste sectors.

b) Our supply chain

During the 2024-2025 financial year, the Cobalt Group spent around £30.2 million annually across all suppliers, the vast majority of which are based in the UK. Our supply chain is comprised of sub-contractors, support service providers, and the manufacturers and suppliers of materials and products.

Our procurement policy is centrally led and locally implemented, with commitments to suppliers made by each Cobalt company under the delegated authority principle.

All Cobalt Group employees have a duty to be alert to the risks of modern slavery, however small. Employees are expected to report their concerns, and local management to act upon them. The Group Director of Legal Affairs, Compliance and Business Services is responsible for maintaining the processes of identifying, assessing and responding to modern slavery by upholding the governance structure that provides senior management oversight and management of the modern slavery risk.

The Quality, Accounts and Human Resources teams have gathered information to enable the company to respond to the legislative requirements concerning modern slavery. We have consulted information provided by Walk Free (an international human rights group dedicated to the eradication of modern slavery), the Open Supply Hub (who publish supply chain data to the general public) and the U.S. Department of Labor (Bureau of International Labour Affairs) to map our supply chain risks.

2024 saw the publication of our first Modern Slavery Statement, and the completion of the Group's first risk assessment of our Tier 1 supply chain. The company has not yet mapped Tier 2.

Although the risk assessment revealed there to be a low risk of modern slavery within Tier 1, we plan to investigate the tier 2 supply of goods containing cotton and minerals potentially sourced from conflict zones in the next financial year.

## 2. Policies in relation to slavery and human trafficking

The Cobalt Group is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing Policy.** Cobalt Energy encourages all its employees, temporary employees, workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- **Code of Conduct.** The Code of Conduct sets down the actions and behaviour expected of employees when representing the Company.
- **Terms of Business (Supply of Services).** Our Terms of Business set out what we expect of our suppliers in connection with Modern Slavery and identifies the sanctions we shall take in the event of a breach.

The Whistleblowing Policy and Code of Conduct are signposted to all employees during their induction and are available to all employees for reference via the company SharePoint.

The Terms of Business (Supply of Services) are communicated during the ordering process. Although we have not identified any cases of modern slavery within our supply chain, our supplier Terms of Business now state that any contract would be terminated in the event of modern slavery being found.

During the 2024-2025 financial year, we developed work instructions covering how to respond when modern slavery is suspected and how to perform a modern slavery risk assessment. These instructions were developed following training provided by the Supply Chain School of Sustainability where anti-slavery

practices within the NHS were discussed. They also used information supplied by Unseen, the UK-based anti-slavery charity running Modern Slavery Helpline.

Next year, the Group plans to develop a Modern Slavery Policy and a Supplier Code of Conduct to strengthen our efforts to combat this risk. We shall also review relevant international standards to identify areas for improvement and appropriate linkage.

### **3. Due diligence processes for Modern Slavery and Human Trafficking**

The Company undertakes due diligence when considering taking on new suppliers and periodically reviews the practices of its existing suppliers.

The Company's due diligence process includes (but is not limited to):

- requesting extensive information about their practices and performance by means of a Pre-Qualification Questionnaire (which includes questions about modern slavery)
- building long-standing relationships with suppliers and making clear our expectations of business partners
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

To combat the small risk of modern slavery within the sub-contractor workforce that support our operational outages, we now display posters, during our outages, advising of the Modern Slavery helpline telephone number.

The Group has now developed a work instruction covering how to respond when modern slavery is suspected. This includes advice on how to escalate the matter internally and externally. This provides details of the Modern Slavery helpline.

During 2024-2025, no incidents of Modern Slavery were reported or detected within the Group or its supply chain.

During the next financial year, the Group will continue to review the updated Transparency in Supply Chain guidance to improve its supplier and worker engagement, assess its approach to human rights due diligence across the company, and determine whether our business model contributes to modern slavery. We shall also investigate remediation measures and clarify our response in the event of an incident.

We shall continue to engage with peer-learning to identify best practice.

### **4. Risk assessment and management**

The Cobalt Group completed its first Modern Slavery Risk Assessment on 28/04/25. It was performed by the Q&E Team and shall be reviewed on an annual basis.

The Risk Assessment is performed using desk-based research; the key sources are company purchasing records, the Global Slavery Index and the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor.

The Risk Assessment revealed a very low risk of modern slavery from our direct activities in the UK. Our assessment revealed that the purchase of cotton-based goods (e.g. workwear) and electrical/electronic products (e.g. IT equipment) may pose a risk from further within the supply chain. We intend to investigate the provenance of the goods we buy within these categories in the next financial year.

We are also aware that our outage work occasionally uses migrant labour. While all such sub-contractors are vetted before use by means of an extensive pre-qualification questionnaire which is reviewed by a

multi-disciplinary team of managers, this process could be strengthened by additional on-site checks on the conditions for the workers used.

We will continue to develop our knowledge of Modern Slavery Risk Assessment techniques and resources during the next financial year. We will audit the information provided by our Pre-Qualification Process to establish where there may be gaps in compliance or information historically provided.

## 5. Training on modern slavery and trafficking

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Cobalt Group requires all employees to complete an online training course about Modern Slavery.

All employees - existing and newly recruited, are required to complete an online course about Modern Slavery on an annual basis. This training course was developed and is delivered externally by iHASCO (part of the Citation Group) and is IOSH approved as an e-learning short course.

The course:

- highlights the requirements for compliance with the Modern Slavery Act 2015,
- discusses the definition of slavery and provides examples of the various forms it may take
- identifies actions that the company and its employees can take to help eliminate slavery in the UK

By the end of the 2024-2025 financial year, 56% of employees had completed the Modern Slavery training.

In the next financial year, additional management training will be sought to enhance the company's identification of and response to the risk of modern slavery.

## 6. Performance indicators

The Company uses the following key performance indicator (KPI) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains: - requiring all employees to have completed training on modern slavery.

For the 2025-2026 financial year, the following goals and KPIs have been met.

Goal	KPI
Improve detection of modern slavery within the company	% of all employees who have completed modern slavery training > 90%
Improve detection of modern slavery within the company	% of operational sites displaying authorised modern slavery poster in high-traffic areas
Improve transparency in our supply chain	% of qualifying suppliers with modern slavery statements
Determine effectiveness of the identification and prevention of modern slavery	# of instances of modern slavery reported in 2025-2026 financial year.

The Group Director of Legal Affairs, Compliance and Business Services is responsible for setting the company's modern slavery goals and KPIs and tracking their implementation.

During the next financial year, we shall monitor the effectiveness of the goals and KPIs selected and investigate the use of qualitative data in future.

This Statement will be regularly reviewed and updated annually. The Cobalt Group Board of Directors endorses this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: **Claire Bailey**

Position: **Legal Director**

Signature: 

Date: **05 November 2025**