

Modern Slavery Statement

**Slavery and human trafficking statement for the financial year
ended 31 March 2026**

30 September 2026

Revision 1

Document change control

All changes are to be agreed and authorised by the CEO

Version History

Version	Publish Date	Description
1	30 September 2026	Initial issue

Document sign-off

	Signed	Date
CEO		30 September 2026

All changes are logged in the Policies Document Control Register.

Contents

Document change control	1
1. About this statement	3
2. Brockwell Energy Limited's business and supply chains	3
3. Policies and governance	3
4. Supplier due diligence and controls	4
5. Training and awareness	5
6. Reporting concerns and remediation	5
7. Assessing effectiveness	5
8. Approval and signature	5

1. About this statement

This statement is made by Brockwell Energy Limited (BEL) pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by BEL during the financial year ended 31 March 2026 to seek to ensure that slavery and human trafficking were not taking place in its business or supply chains.

BEL conducts aspects of its business through subsidiary project and service companies. Accordingly, this statement also addresses relevant subsidiary activities where they form part of BEL's business or supply chains.

2. Brockwell Energy Limited's business and supply chains

Brockwell Energy Limited is a UK based independent power producer specialising in renewable energy infrastructure. It originates and develops projects, arranges their structuring and financing, oversees construction and commissioning and manages operational energy assets. Its principal areas of activity are onshore wind, solar and battery energy storage.

BEL undertakes these activities directly and through subsidiary project and service companies. Brockwell Energy Services Limited (BESL) provides asset management and related technical and operational services to Brockwell project companies. Across these activities, BEL and its subsidiaries engage with joint venture partners, funders, construction and engineering contractors, consultants, equipment suppliers and operation and maintenance providers.

During 2025/26, North Kyle Wind Farm Limited (North Kyle) was the principal operating project within BEL's subsidiary structure. North Kyle is a 220.5 MW onshore wind farm comprising 49 turbines in East Ayrshire. It achieved first export in April 2025 and moved from construction and commissioning into operation during the year. Its supply chain included construction and engineering contractors, equipment suppliers, logistics providers and operation and maintenance providers.

BEL's principal supply chain relationships support project development, construction, commissioning and operation and include:

- manufacturers and suppliers of wind turbines, electrical and grid connection equipment and other energy technology;
- civil engineering, construction, commissioning, logistics and site service contractors, including subcontractors;
- operation and maintenance, asset management and energy management providers;
- technical, environmental, planning, engineering and health and safety consultants; and
- information technology, facilities, legal, financial, insurance and other professional service providers.

3. Policies and governance

During the financial year, BEL maintained policies addressing modern slavery, human rights, ethical conduct, procurement and the reporting of concerns.

Its principal relevant policies were:

- the Anti-Slavery & Human Trafficking Policy and Guidelines;
- the Human Rights Policy & Guidelines;
- the Supply Chain & Procurement Policy & Guidelines;

- the Ethics & Code of Conduct Policy & Guidelines; and
- the Public Interest Disclosure (Whistleblowing) Policy & Guidelines.

The Anti-Slavery & Human Trafficking Policy applies to BEL and all its subsidiaries. It assigns overall responsibility to the Board, day to day implementation to the Chief Executive Officer and responsibility for monitoring its use and effectiveness, responding to queries and auditing relevant internal controls to the Chief Financial Officer. Managers are responsible for ensuring that those reporting to them understand and comply with the policy.

The Supply Chain & Procurement Policy, approved on 25 February 2025, applies to corporate procurement and project sites. It establishes standards for supplier selection, engagement and ongoing management and requires procurement managers and project teams to consider ethical conduct, human rights, fair labour practices and regulatory compliance.

BEL policies underwent a full review during the financial year ending 31 March 2026 to confirm their suitability and the allocation of specific management oversight and responsibility. BEL also maintains an Employee Handbook and, through the policy review process, a number of HR-aligned policies were merged into the handbook, including the whistleblowing policy. The new Employee Handbook was issued to employees, who were required to confirm that they had read and understood it.

Staff have access to and receive training on policies and related implementation relevant to BEL's business and workplace through the iHasco online training platform.

4. Supplier due diligence and controls

BEL's Anti-Slavery & Human Trafficking Policy provides for due diligence when new suppliers are appointed and regular review of existing suppliers. The stated process includes communicating BEL's expectations to business partners, evaluating the modern slavery and human trafficking risk presented by each new supplier and requiring corrective action where standards are not met. BEL may impose sanctions or terminate a relationship where a supplier fails to improve in accordance with an agreed action plan.

The Supply Chain & Procurement Policy provides for potential suppliers to be evaluated by reference to environmental practices, social responsibility, quality and regulatory compliance. It also provides for ongoing supplier monitoring and evaluation, with corrective action, sanctions or termination available where non-compliance is identified.

BEL's policies require modern slavery and human trafficking risks to be considered when new suppliers are assessed and existing suppliers are reviewed. Potential risk areas arising from BEL's business model and relevant subsidiary activities include construction and maintenance supply chains, contractors and subcontractors, temporary or agency labour and the manufacture and sourcing of renewable energy and electrical equipment.

During the financial year ending March 2026, BEL made no new material supplier selections or entered into new contracts with contractors or equipment suppliers. No construction projects were started requiring supply chain screening or modern slavery audits. Supplier activity was mainly delivered through existing and long-term relationships with reputable professional service firms, including legal and accountancy firms.

Preparations were made for upcoming procurement and supplier activity in the new financial year to support anticipated new construction projects. A Procurement Strategy Paper was established and approved by BEL's CEO, confirming how modern slavery risks will form a key component of supplier assessment, contract management and ongoing supplier monitoring. This will be delivered through

pre-qualification and tender evaluation criteria focusing on ethical labour practices, supply chain management and supporting evidence, including audits, certifications and internal governance arrangements.

5. Training and awareness

The Anti-Slavery & Human Trafficking Policy provides that training on the policy and the modern slavery risks faced by BEL's business forms part of the induction process for relevant personnel. It also provides for BEL's commitment to be communicated to suppliers, contractors and business partners at the outset of the relationship and reinforced as appropriate.

During 2025/26, the policy was briefed to all staff, an e-learning course on Modern Slavery was assigned to all employees, and an annual refresher course was established. BEL's expectations were communicated to relevant suppliers and contractors through onboarding discussions. For major contractors and suppliers, new contract provisions were incorporated to confirm explicitly the contractual remedies available for breaches of modern slavery obligations.

6. Reporting concerns and remediation

Relevant personnel are required to report suspected conflicts with the Anti-Slavery & Human Trafficking Policy to the Chief Financial Officer and may also raise concerns through Brockwell's whistleblowing arrangements.

The policy protects individuals who raise genuine concerns in good faith and permits disciplinary action, corrective action or termination of supplier and contractor relationships where a breach is established.

BEL received no reports of suspected modern slavery during the year.

7. Assessing effectiveness

The Chief Financial Officer is responsible under the Anti-Slavery & Human Trafficking Policy for monitoring the policy's use and effectiveness and auditing relevant internal controls. BEL's policies also provide for monitoring supplier performance and taking corrective action where required.

Due to the continued use of historically approved suppliers during the year, and the nature of those suppliers as professional services firms, no quantitative measures relating to modern slavery controls were established. Ongoing effectiveness was assessed through management oversight and supplier monitoring.

8. Approval and signature

This statement was approved by the Board of Directors of Brockwell Energy Limited on 30 September 2026. The authorised sign-off is recorded in the Document change control section.