



OUR MODERN SLAVERY STATEMENT 2025

INTRODUCTION

EDF is one of the UK's largest energy companies and the largest producer of low-carbon electricity which we support with our Powering Net Zero company ambitions, producing around one-fifth of the nation's electricity from its nuclear power stations and renewables.

This statement is made by and on behalf of EDF Energy Limited, its parent company, EDF Energy Holdings Limited, and its subsidiaries, which make up the EDF in the UK as a whole (together, in this statement, referred to as EDF). Those subsidiaries of EDF Energy Holdings Limited that are required to make their own statement under the Modern Slavery Act 2015, together with NNB GenCo (HPC) Limited.

EDF has a focus on safe, dependable, energy generation and an ethos of service excellence. We intend to play a leading role in new nuclear build in the UK and secure a bright future for the combined business and its employees.

Our society depends on energy to live, work, develop and grow. Our customers depend on us to produce affordable low-carbon energy, and we depend on our people to help us take on new challenges and fulfil our ambitions. Being a sustainable and responsible energy business is an integral part of EDF's 2030 strategic business vision – to be an efficient, responsible electricity company and a champion of low-carbon growth.

Doing business in an ethical way is one of our most important values. Through our [Helping Britain Achieve Net Zero](#) approach, we are working to ensure sustainable, ethical practice across our supply chain, and we will not tolerate any fraud, corruption or abuse of human rights. At EDF, we recognise that Modern Slavery and human trafficking are growing global concerns, and we are working to ensure that our own operations, and those of our supply chains, are appropriately evaluating the risks of Modern Slavery and human trafficking. We are working to mitigate these risks as far as possible through our commitment to ethical business. We report our sustainability performance annually through our Helping Britain Achieve Net Zero and are signatories to the [United Nations Global Compact](#) (UNGC). We strive to improve our standards of ethical behaviour continuously, and our commitment to ethical business practice is outlined in our [Ethics & Business Conduct Policy](#). EDF requires its supply chain partners to operate in a manner that demonstrates the same commitment to sustainable, responsible and ethical business that EDF requires of its own people and business activities. The [EDF in the UK Sustainability and Ethics Supplier Requirements](#) Manual sets out EDF's expectations in relation to sustainability and ethics, as well as ethical business, and applies to all suppliers and sub-contractors.





OUR PEOPLE

We employ around 12,600 people, alongside a supply chain consisting of around 3,400 suppliers. We also indirectly hire, and work with many more people, including agencies and contractors.

All our people are expected to work to our guiding principles for ethical behaviour and our business values are communicated through a variety of channels. We have supporting documents in place to guide our employees to work in an honest and ethical manner, as well as giving them the confidence and tools to report any suspected unethical conduct in the organisation.

Our Codes of Conduct requires and reminds our people that we are a company that acts honestly and ethically. Employees are reminded that they must report any concerns of potentially illegal activities,

unethical conduct or anything that might prejudice the business, using EDF's Confidential Reporting of Serious Concerns procedure.

EDF is committed to fair employment practices and to ensuring legal and regulatory compliance. This commitment, in addition to the policies and procedures described above, collectively demonstrates our on-going commitment to the elimination of any risk of Modern Slavery practices. Within this commitment EDF have created Modern Slavery Training based on the recommended training set out on the Government Website. Targeted areas within our business will undertake this training which also allows KPIs to be monitored and target areas to be reviewed.

OUR SUPPLY CHAIN

We contract with suppliers to ensure that we have the goods and services needed to generate and supply electricity, gas, and energy services to our customers. We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have a rigorous approach to ensuring compliance within our supply chain.

Our supply chain due diligence processes include defined procedures and monitored on-boarding and qualification of all new suppliers. These processes help to identify any potential risks relating to slavery and human trafficking, and we carry out thorough risk assessments to identify areas of focus in relation to Modern Slavery concerns.

Supplier standard

At EDF we have a set of [Minimum Standards](#) that suppliers are required to abide by. These include a requirement for suppliers to complete a risk-based self-assessment aligned to the 10 Principles of the UNGC. This provides us with our first opportunity to assess and mitigate the risks associated with Modern Slavery.

We encourage our supply chain to drive positive social and environmental change. We include Modern Slavery obligations within our precedent contracts and assess supplier standards at all parts of the procurement lifecycle from specification through procurement and contract delivery.

The initial stage of due diligence takes place at either supplier onboarding or during tendering. EDF communicates its expectations and gathers data and information to inform supplier selection and approval prior to contract placement. Through our Supplier Relationship Management activities we research and reassess potential supply chain risks to project delivery working with our partners to understand and mitigate any risks identified.

EDF implement SRM practices throughout most of our business units, conducting assessments of various risks to supplier delivery within the framework. We also conduct financial crimes and sanctions screening during supplier onboarding and annually thereafter throughout our partnership to enable EDF to stay informed of global developments and ensure compliance to contractual constraints.



Risk assessment

We adopt tender specification requirements to set expectations of how goods and services should be delivered. Tender evaluation processes are also designed to establish whether suppliers can meet these expectations. We consider awarding contracts to companies registered in the UK and additional due diligence processes, where deemed appropriate, are put in place for organisations based outside the UK.

HIGHEST AREAS OF RISK

Nuclear New Build

Our Hinkley Point C (HPC) nuclear new build project is one of the largest construction projects in Europe. It carries a heightened risk of Modern Slavery occurring owing to its complex supply chain as well as the size and transience of the site's workforce.

Further details as to the means by which Modern Slavery risks are addressed at HPC are set out in the project specific Modern Slavery statement which can be found on the HPC project website

Power Station Maintenance and Development

Nuclear generation and nuclear new build activities are subject to regulatory oversight from the [Office for Nuclear Regulation](#) and part of this oversight requires a high level of transparency from our suppliers. This includes ensuring that only duly authorised and other suitably qualified and experienced persons perform duties required by our nuclear generation business. Our parent company, [EDF SA](#), also oversees our ethical performance including alignment to UNGC.

Smart Meter Production and Installation

The known risks around sourcing and installing smart meters are understood and are addressed throughout the tendering and contract management processes, including site-visits to smart meter suppliers. Those involved with installing meters are employed through UK registered companies and have the relevant security and recruitment checks required by English and/or Scottish law (as appropriate).

Fuel Supply

Obligations contained within our contracts for the purchase of nuclear fuel are aligned to the [UN Declaration of Human Rights](#), the [EU Charter of Fundamental Rights](#) and the [International Labour Organisation conventions](#).

Most of the gas we buy, both for sale to our customers and for use in our power stations, is purchased via our affiliate company. Our gas is received via the National Balancing Point (which is a gas trading facility run independently of EDF) or via Beach Gas at a UK terminal. As gas is a fungible product, it is not possible for us to track the supply chain backwards.

Solar Panels

The Solar developments within EDF Renewables UK and Ireland carry an increased risk of Modern Slavery Risk due to the complexities in the supply chain relating primarily to solar panels. To mitigate these risks, solar panels are sourced at group level and the relationships are managed according to the EDF Renewables module procurement framework. Suppliers are subject to an elevated compliance screening and certification process.

Battery Energy Storage Systems (BESS)

Historically, BESS has carried an increased risk of modern slavery in the supply chain, particularly due to the use of cobalt in lithium-ion battery cells. A significant proportion of the world's cobalt originates from the Democratic Republic of Congo, a region with an elevated human rights risk profile. However, we have transitioned from Nickel Manganese Cobalt (NMC) cells to Lithium Iron Phosphate (LFP) cells, which do not contain cobalt, thereby eliminating this risk from our more recent and current procurement process.

While we do have legacy NMC containing systems, these were sourced from vendors with a strong commitment to responsible materials sourcing, ensuring ethical procurement standards were met at the time.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes EDF's slavery and human trafficking statement for the financial year ending 31 December 2024.

Signed:

Director, EDF Energy Holdings Limited

The Republic of Ireland has similar legislation, primarily the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013 and the Group's Irish entities (and their subsidiaries) comply with the principles enshrined in that legislation

EDF Renewables Ireland Limited
Wicklow Windfarm Holdings Limited

Subsidiary organisations covered within the published Group Statement dated May 2025

- EDF Energy Customers Limited
- EDF Energy Limited
- EDF Energy Nuclear Generation Limited
- EDF Energy TSO Limited
- EDF Energy Holdings Limited
- EDF Energy Renewables Limited
- EDF Energy Renewables Holdings Limited