



# MODERN SLAVERY STATEMENT 2026

## Introduction

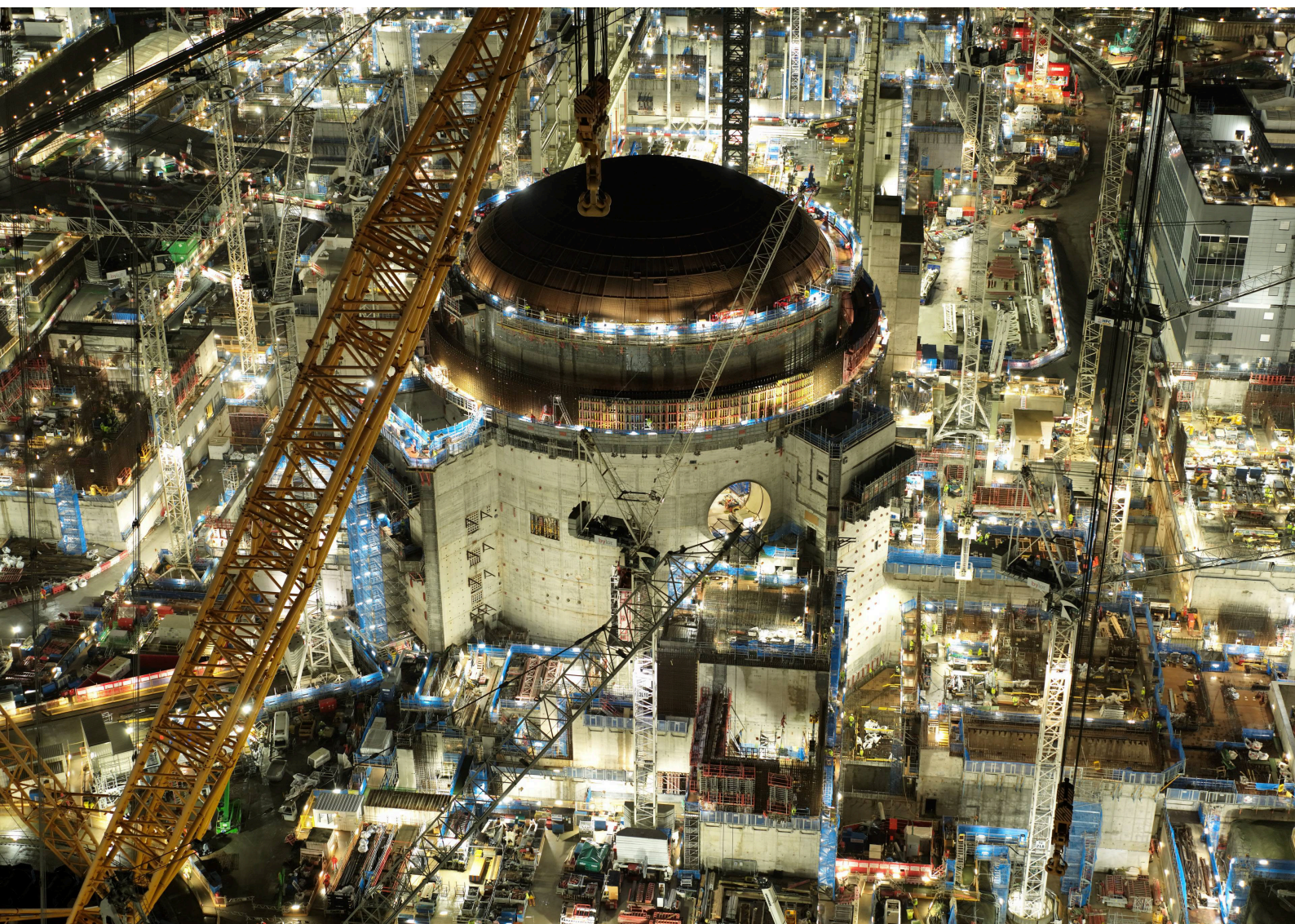
Hinkley Point C (HPC) is being constructed on the Somerset coast by NNB Generation Company (HPC) Limited ("HPC"), a subsidiary of EDF Energy Limited (EDF), and is one of the largest construction sites in Europe. When generation begins, the nuclear power station will provide low carbon electricity to around 6 million homes.

Whilst HPC is referenced in the EDF Energy (UK) Group Statement, the project's Board of Directors is mindful of the risks of modern slavery and worker exploitation associated with the construction of a large infrastructure project. The safety and wellbeing of the workforce is of paramount importance to HPC - we have zero tolerance for modern slavery or human trafficking across our business and within our supply chain. The publication of this statement demonstrates the project's commitment to controlling the risk of modern slavery or human trafficking in all its forms across the project, aligning with our broader Environmental, Social, and Governance (ESG) principles to ensure ethical practices.

Risk exposure to modern slavery is ever evolving. We are dedicated to adapting our business and working with our supply chain accordingly. The current socio-economic and political landscape, including conflicts across the globe, have led to new potential opportunities for human traffickers to traffic vulnerable people into the UK to work. Therefore, we must ensure that our policies remain up to date to manage this increased risk.

## Our people

The project has a duty to protect all workers from the risks of modern slavery, whether or not they work directly for HPC or form part of the wider supply chain. The HPC commitment of "Zero Harm" is the sites over-riding priority in ensuring that all workers on site are safe and feel protected, which includes being safe from modern slavery related threats.





## **Contractual protections and worker checks**

Workers on site are either employed directly by NNB Generation Company (HPC) Ltd or are contracted to our project by one of our named agencies or contractors. HPC requires contractors to directly hire construction operatives where possible, this ensures that records of payments to workers and the terms and conditions of their contracts are also included in the payroll audit scope. Note that where agencies are used to find staff, these agency arrangements are only used on a short-term basis and only agencies approved by the Site Joint Council and Joint Project Board can be used. As part of the mobilisation process minimum onboarding requirements are clearly set out to our Tier 1 contractors. Each worker is appropriately onboarded by their contracting organisation; this includes a combination of pre-employment checks and vetting to provide a level of assurance. The employing organisation, with support of their appointed Screening Service Company, will check their identity, and right to work in the UK in line with HMG Baseline Personnel Security Standard. As part of the BPSS Process, a Criminal Record Check will be completed by the EDF Central Vetting Team.

All of our people working on our HPC site and associated developments are expected to work within our guidelines on ethical behaviour, which are set out in the HPC Worker Code of Conduct which is listed in the Universal Document Selection Tool (UDST) for inclusion in all our contracts and communicated and signed by all workers when they attend the mandatory induction process prior to joining our project.

As part of the mobilisation process Tier 1 contractors are provided with formal procedures and guidance on the minimum requirements against which workers are onboarded. The HPC Employment Affairs Unit's (EAU) Workforce Audit Team carry out regular and extensive audits on newly onboarded workers, supervisors, and managers as well as those carrying out safety critical roles. These audits ensure that the managed service worker workforce have the minimum competencies and qualifications to carry out their role. In 2025, 2,534 individuals were audited, representing a 39% increase on 2024, site access is revoked until contractors can evidence an individual's full compliance with these requirements. From time to time the EAU Workforce Audit Team will also provide additional guidance and direction to Tier 1 contractors to ensure full understanding of the on boarding and audit processes.

## Training

Completed by every member of the site workforce, the Project Induction includes information on modern slavery and about our "SafeCall" confidential whistleblowing service, which allows people to anonymously inform us of potential modern slavery issues at HPC. The content explains what modern slavery is and the high risk to the construction industry today. The induction highlights means by which instances of modern slavery or worker exploitation can be identified and an explanation is given as to how such concerns can be reported. In 2025, 8,168 individuals attended the full HPC Project Induction, with an additional 4,814 online Project Introduction refreshers completed.

In addition to the HPC induction process, each Tier 1 Contractor is required to have their own, separate induction process for any staff working directly with them or via a subcontractor. Both inductions are open to attendance by trade union representatives with a view to supporting recruitment to the trade unions and offering further protection for the workers.

HPC also has an online training course developed in collaboration with the UK's largest modern slavery charity, Unseen, this is mandated to all EDF Hinkley Point C employees and embedded contractors. The course is tailored to HPC's specific requirements to help staff spot and report where modern slavery or worker exploitation may occur. Project wide awareness of this critical issue is also furthered via "Lunch and Learn" sessions and daily safety messaging, the latter of which allows the communication of the project's expectations and how concerns can be reported across the project's 13,000 strong workforce.

As one of our key new entrant training pathways, the Hinkley Support Operative programme, we have included specific training and signposting to support regarding the topic of Modern Slavery, ensuring that anyone joining the project through this route is well placed to understand how to spot the signs and where to seek support for themselves or others.





## Our supply chain

To ensure that our suppliers are committed to the same values as we have as a project, our Tier 1 contractors (i.e. the organisations with whom HPC contracts directly) are subject to detailed assessments to demonstrate they are committed to complying with applicable laws - including the Working Time Regulations 1998 - as well the project's own stringent standards in ensuring worker exploitation does not occur at HPC. Specifically, before suppliers are invited to submit tenders for contracts, the project issues a pre-qualification questionnaire ("PQQ"). The PQQ includes a question to determine the supplier's alignment to the ten principles of the UN Global Compact. This helps us identify any potential risks relating to modern slavery within a supplier's organisation, whilst also presenting us with the opportunity to communicate our commitment to the UNGC and our expectations in relation to modern slavery. HPC is committed to ensuring that our suppliers engage with our commitment to have a supply chain free from modern slavery and take action to ensure this is maintained within their own supply chains.

On HPC, two independent third party auditors have been engaged to carry out monthly payroll audits on the contractors that work on our construction site and report back to HPC. Over 30 of these audits were carried out in 2025. The monthly audit reviews the payroll records of workers employed by our contractors, to help ensure that wages are being paid in full to the workers. These audits highlight; the number of workers engaged by each contractor, the hours worked, the allowances paid, the leave that has been taken, and the welfare cover provided. An additional pensions audit is undertaken once per year on a sample of contractors to ensure compliance with our agreements.

These audits help us ensure that people are being paid and managed in line with the HPC Industrial Relations Agreements. Payroll records for more than 12,000 site operatives were subject to audit last year. Where any observations are raised appropriate actions are taken.

## Stewards, mental health first aiders and accommodation providers

At HPC, in addition to trade union safety representatives, there are over 100 stewards from diverse backgrounds who assist in identifying instances of any form of worker exploitation occurring. The stewards provide a clear point of support and present a continuous opportunity for workers to be able to raise any issues or concerns. Negative mental health can also be regarded as an indicator of modern slavery and our network of over 900 mental health first aiders across our locations, operating 24 hours a day are trained to provide support in these instances.

The project is proud to be supported by a number of trade unions. Our contractors and subcontractors must not prevent or discourage workers from joining or forming trade unions.

## Governance and management of risk

The HPC Modern Slavery Forum oversees the project's anti-modern slavery control measures and acts upon (and escalates as necessary) any identified concerns. This forum is comprised of representatives from the Employment Affairs Unit, Industrial Relations, Security, Supply Chain, Community Relations, Compliance, and Legal. This forum meets regularly to discuss developments in this area, areas of concern and the effectiveness of the controls in place to mitigate the risk of modern slavery or worker exploitation occurring.

## External agency engagement

Engagement continues with Avon and Somerset Constabulary to discuss mitigation of Serious Organised Crime at HPC, which includes the implementation of the '4 P Plan' - Pursue, Prevent, Protect and Prepare - with the aim of improving the intelligence landscape and mitigating the risk of serious organised crime, which is closely associated with instances of modern slavery or worker exploitation. Selected worker identity verification and liaison continue with the Home Office Immigration Field intelligence Team; the engagement can help mitigate worker exploitation through identification of any anomalies.

In addition, throughout 2025, HPC has hosted numerous senior Avon & Somerset Constabulary personnel which included the local Chief Superintendents, the Chief Constable and the Assistant Chief Constable all with a view to understanding the project landscape and working collaboratively to reduce the risks associated with criminality.

Outside of the working group we also maintain relationships with Unseen, and Gangmasters and Labour Abuse Authority (GLAA) to share knowledge, ensure best practice and seek support as and when required.

This statement is made as an HPC project specific addendum to the EDF Energy (UK) Group Modern Slavery statement for the financial year ending 31 December 2025.

Signed:



Date: \_\_\_\_\_

30/03/2026

Stuart Crooks, Chief Executive Officer HPC

NNB Generation Company (HPC) Ltd