



Modern Slavery Policy Statement

Document Control

Version Control/Revision History

This document has been through the following revisions:

Version	Date of Approval	Remarks/Keys Changes/Reason for update
1	December 2024	BioticNRG Board
2	February 2026	BioticNRG Board Annual Review

Authorisation

This document requires the following approvals:

Authorisation	Name
Initial version	BioticNRG Board
Annual revisions	BioticNRG Board

Modern Slavery Policy Statement

This statement is made by BioticNRG Limited (the **Company**) pursuant to Section 54 of the UK Modern Slavery Act 2015 (the “**MSA**”). It sets out the steps that the Company has in place or taken during the financial year ending 31st December 2025, to combat and prevent all forms of modern slavery and human trafficking in its business and supply chains. This statement covers the Company’s direct operations and supply chains.

The Company and its subsidiary companies adhere to and promote strong professional ethics and are committed to conducting their businesses according to the highest standards of honesty and fairness. This commitment to observing such ethical standards is designed, not only to ensure compliance with applicable laws and regulations in the various jurisdictions where the Company and its subsidiaries operate, but also to earn and keep the continued trust of its clients, shareholders, personnel, and business partners. We believe that success and reputation is not only dependant on the quality of our products and services provided, but also on the way we do business. This includes a strong commitment to human rights, and we welcome the transparency promoted by the MSA.

1. Company structure and business

The Company and its subsidiaries are incorporated in the UK. As a responsible asset owner and operator, we actively invest for the long-term to help our clients, shareholder, our employees and the wider community.

2. Company supply chains

The Company and its subsidiaries purchase products and services for the purpose of its internal operations, including IT, waste supply and services, parts supply, gas, electricity CO2 and bark sales as well as HR and Consulting Services. As a green energy, haulage and composting business, most of our impacts on society are linked to our choice of suppliers, with a limited impact from our internal processes. The Company integrates both social and environmental dimensions into its Procurement selection process. Suppliers sourced must be committed to sustainability and to protecting human rights, which is covered in our third-party supplier vetting process.

3. Engagements and policies

We are committed to respecting all internationally recognised human rights principles including supporting the elimination of all forms of forced and compulsory labour and the effective abolition of child labour. This policy affirms our intention to act ethically in our business relationships.

Our Company has numerous policies in place to protect these rights, such as Anti Bribery and Corruption Policy, Outsourcing Policy, Conflict of Interest Policy, Code of Conduct Policy and Whistleblowing Policy. Our Handbook protects employee rights on dependency leave and protection from all forms of harassment.

4. Management of the modern slavery and human trafficking risk in the Company's operations

The Company acknowledges its responsibility to respect human rights in its operations and conducts its business in compliance with applicable employment regulations in the jurisdictions in which it operates. The Company respects the rights of its employees and workers to enjoy just and favourable conditions of work, including health and safety protections, and are committed to providing adequate information and training on health and safety and wellbeing issues.

The Company promotes diversity and inclusion by prohibiting any form of unlawful discrimination. Staff have been trained on modern slavery and human trafficking risks and are encouraged to report any concerns.

We work with suppliers and customers who share the same views as our business on the importance of protecting Human Rights and preventing modern slavery through a documented vetting process. The majority of our services are carried out by our own full-time employees. Full employment checks are undertaken on any new employees to ensure that they have the legal right to work and all staff are

paid above the minimum wage. There is therefore a low risk of any modern slavery and trafficking issues within our own staff. There is a potential risk that sub-contractors or third-party service providers who provide labour or services to our company may not share the same ethos as ourselves. In order to mitigate this risk, we generally only work with contractors and suppliers who we have long term relationships with which ensures that we are aware of their employees and conditions that they work under from our close working with them. Any new sub-contractors are vetted using our Subcontractor questionnaire which includes confirmation of compliance with Modern Slavery legal requirements. Where there are any Modern Slavery concerns or issues, additional auditing and spot check inspections will be undertaken by General Counsel.

5. Performance Indicators

The Company uses the following key performance indicators ("KPIs"), to measure the effectiveness of our actions in ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains. These KPIs include supplier due diligence and the assessment of modern slavery risks, where necessary; completion of relevant training by all staff to raise awareness levels; and the monitoring of any reported concerns or incidents received. These indicators are reviewed regularly to support continuous improvement and ensure appropriate action is taken where risks are identified.

6. Responsibility for this Policy

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The HR Manager has primary day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

7. Compliance with this Policy

All Employees and contractors must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All employees and contractors must avoid any activity that might lead to, or suggest, a breach of this policy.

Any employee or contractor becoming aware of, or suspecting, a conflict with this policy has occurred, or may occur in the future must immediately inform General Counsel. Employees and contractors are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. We will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their line manager or General Counsel.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If an employee believes that they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied, employee's, can raise the issue formally using our Grievance Procedure, which can be found in the current employee handbook.

8. Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals, sub-contractors and organisations working on our behalf if they breach this policy.

9. Further steps

The Company will continue to review its current practices to detect and prevent modern slavery and human trafficking within its operations and supply chains, and will endeavour to enhance any procedures, policies, or practices, that it deems appropriate.

The Boards of Directors of BioticNRG Limited and each of its subsidiaries endorses this policy statement and is fully committed to its implementation. This statement was approved on 10th February 2026, which constitutes each Company's slavery and human trafficking statement made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2025.