

Modern Slavery Statement

This statement is ersg's response to the UK's [Modern Slavery Act 2015](#) and is published in line with s. 54 (1). This policy applies to our employees, contractors, suppliers, and clients, and sets out the steps ersg has taken during the financial year ending 31 December 2025 to ensure its supply chains are slavery free.

Our Structure

Ersg Holdings Ltd is the parent company of ersg Group and its subsidiaries ("ersg"). It is incorporated in England and Wales under company number 09147252. Across the group, we have over 200 employees spanning three continents, fourteen countries, and eight offices. This statement relates to ersg Holdings Ltd and its subsidiary entities.

Our Purpose

ERSG is a global recruitment company that places highly skilled professionals into the energy sector on temporary, permanent and fixed-term contracts. We pride ourselves on sourcing the best staff in the UK, Europe, US, and beyond for our clients and their projects. Over the years, we have developed an expertise across a range of sectors including Onshore & Offshore Wind Energy, I.T. & Digital, Oil, Gas & Power, Built Environment, Transmission & Distribution, and Subsea & Marine.

Our Commitment to the Principles of the Modern Slavery Act 2015

Ersg wholeheartedly endorses the principles of the Modern Slavery Act 2015 and is dedicated to achieving the abolition of modern slavery, human trafficking, and forced or compulsory labour and child labour globally.

We are an equal opportunities employer, meaning that we're committed to creating and maintaining non-discriminatory recruitment processes and working environments for our internal staff and our temporary workers and contractors. We aspire to the highest standards in the conduct of our business and activities worldwide.

Our Supply Chain

Our supply chains include independent contractors and small suppliers, and our clients range from local businesses to global renewable energy companies. We know that modern slavery is an ongoing risk, and we take this seriously. We have a zero-tolerance approach to slavery and human trafficking anywhere in our business or supply chains. We expect everyone we work with, or plan to work with, to share this commitment and to act in line with ersg's anti-slavery values and policies at all time

Our supply chain supports ersg's work as a global recruitment company. We work with a range of suppliers, clients and contractors to provide individuals with work-finding services as an employment agency and business as defined in section 13 (1) & 13(2) of the Employment Agencies Act 1973. We then supply those individuals to our clients.

Ersg upholds a culture that promotes ethical practices and operates with values that reflect our relationships with our principal stakeholders: customers, shareholders, suppliers, contractors and employees. In all of our business dealings, ersg opposes the exploitation of individuals in any form, particularly the offences created by the Modern Slavery Act 2015 and is committed to preventing

human trafficking and slavery by whatever means possible. Ersg expects the same of all who work for and with it.

We regularly review our supply chain and carry out risk assessments on our largest clients. We hold ourselves to high ethical standards and expect the same from everyone we work with. Our processes clearly prohibit the use of forced, compulsory, or trafficked labour, including any form of slavery or servitude. We also expect our suppliers to apply these standards across their own supply chains. If these requirements are not met, our standard terms and conditions allow us to end the business relationship.

Our Policies

The following policies are available to all staff:

- Anti-bribery and corruption
- Equal opportunities and diversity
- Ethics
- Whistleblowing

These policies are updated annually by our HR and Legal teams and available to access on our website.

Steps for the Prevention of Modern Slavery

We are committed to ensuring there is transparency in our own business practices and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015.

All employees and stakeholders must follow ersg's procedures to help prevent modern slavery and to do business in a way that supports its elimination. Employees receive training to raise awareness, are given clear ways to report concerns, and are told how to take action and escalate issues if they believe modern slavery may be happening anywhere in our supply chains.

Ersg complies with the Modern Slavery Act 2015, but acknowledges that it cannot control the conduct of those in our supply chains. To reinforce our compliance, ersg have implemented the following measures:

- conducting periodic risk assessments on our suppliers to determine which parts of our business are most at risk of modern slavery so that efforts can be focused on those areas;
- engaging with our suppliers to convey our anti-slavery policy and assess the measures taken by them to ensure modern slavery is not occurring in their businesses;
- conducting supplier pre-screening as part of our tender process and self-reporting for our suppliers on safeguarding controls;
- undertaking right-to-work checks on all our workers, and using reputable umbrella companies where required, which are regularly audited to ensure compliance with ersg's policies and values;

- including contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) business relationships, both routinely and at times of reasonable suspicion; and
- completing a full compliance check on the contractors and the personal service companies (PSC) with whom we engage.

From financial year 2016, ersg has referenced its Modern Slavery Statement and commitment to upholding the values of the 2015 Act in the directors' report that accompanies the annual financial statements, copies of which are accessible on our website.

Ersg maintains confidentiality for all reports submitted to it under the Modern Slavery Act 2025, and protects its employees and/or workers against retaliation should they raise concerns.

Responsibility for the policy

Responsibility for the prevention of modern slavery rests with ersg's directors and senior management. Ersg's board of directors has the overarching obligation to ensure this policy and its implementation comply with our legal and ethical duties.

Managers are responsible for ensuring that their teams understand and comply with this policy and are given routine training on it.

Legal and HR are responsible for implementing and monitoring the policy, and all employees and workers have a duty to report any concerns within ersg's business and/or supply chain related to any of the offences under the Modern Slavery Act 2015.

How to Report Modern Slavery or Human Trafficking

Ersg's Whistleblowing Policy provides guidance on how concerns can be communicated to us. It applies to all employees and workers, and states that concerns about suspected modern slavery associated with ersg or our stakeholders may be reported by employees to a director, their manager or the Whistleblowing Officer.

Concerns should be raised if any worker:

- suspects a person acting on behalf of ersg is seeking to exploit another in a way which could amount to modern slavery;
- suspects that a person acting on behalf of one of ersg's suppliers is seeking to exploit another in a way which could amount to modern slavery;
- has been approached by a person acting on behalf of ersg who has invited participation in acts which could lead to committing offences under the Modern Slavery Act 2015
- has information which leads to the reasonable conclusion that a person acting on behalf of ersg or any supplier is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports are kept confidential except where ersg is required to pass information to relevant authorities. Ersg ensures full compliance in working with the relevant authorities to assist in the prevention of modern slavery.

Safeguards

We encourage open and honest communication and will support anyone who raises concerns in good faith, even if those concerns later turn out to be unfounded. We are committed to making sure that no one is treated unfairly for reporting a genuine concern about possible modern slavery anywhere in our business or supply chains. Unfair treatment could include dismissal, disciplinary action, threats, or any other negative response linked to raising a concern. Ersg will listen to and take all concerns seriously, including those raised anonymously.

While anonymous reports can make investigations more challenging and may limit our ability to fully look into concerns, we encourage individuals to share their name where possible to help us investigate thoroughly and work to eliminate modern slavery from our business. Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken.

Training and further steps

Ersg provides training as part of its onboarding process for new employees and is implementing annual training for existing staff as a refresher. Resources are also available at any time on the ersg internal intranet.

Communication and awareness of this policy

We aim to communicate our zero-tolerance approach to modern slavery to all stakeholders at the outset of our business relationship with them and to reinforce it as appropriate thereafter.

Review

This Modern Slavery Statement is approved by ersg's board of directors on 12 January 2026 for the financial year ending 31 December 2025. It is reviewed on an annual basis and is updated in accordance with any amendments and additions to the Modern Slavery Act 2015.



Signed by Michael James Ryan
Position: Director, ersg Holdings Ltd
Dated: 20th January 2026
On behalf of ersg Holdings Ltd and its subsidiaries