



Modern Slavery and Human Trafficking Statement

February 2026

drax

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Introduction and statement approval



Dwight Daniel Willard Gardiner (known as Will Gardiner) CEO, Drax Group plc

At Drax, our purpose is to enable a zero carbon, lower-cost energy future. However, the world’s increasing demand for secure, sustainable energy must not come at the expense of human rights. We’re committed to delivering positive outcomes for climate, nature and people.

This is our tenth Modern Slavery Statement. Within it, we outline the continuing improvement we have made in our Supply Chain Human Rights (‘SCHR’) programme in 2025 and summarise our commitments for 2026. Our SCHR programme assesses the risk of modern slavery across our supply chain and manages key deliverables to identify, mitigate and remedy possible human rights and labour abuses.

Drax recognises modern slavery as a global problem that affects millions, and that it can occur in any business, in any country, and within any sector. We also recognise our responsibility to uphold and promote fundamental human and labour rights across our operations and supply chain. We embed our commitment to doing so within our governance and our values, which underpin our purpose and strategy. Together, these define our culture - which has an impact on everything we do.

We continue to make progress in relation to modern slavery while acknowledging we still have work to do to achieve our goals. In 2025, we have focused on our Sustainability Framework, which sets out 26 time-bound targets for climate, nature and people. We are working hard to gain greater transparency on the ethical alignment of our supply chain through enhanced data and ethical audits. We see transparency as the key to identifying modern slavery risks, to fostering accountability, and to driving action in response.

We are making this Statement for the financial year ended 31 December 2025. It is in accordance with the requirements of Section 54, part 6, of the UK Modern Slavery Act 2015 and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act. This Statement applies to all companies within Drax Group plc (‘Drax’) that are required to publish a Statement. The Board has reviewed and approved this Statement, which I signed on behalf of the Board of Directors of Drax Group plc, following its approval on 10 February 2026.

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed in the Statement Scope section below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the reporting year and that I have the authority to bind Drax Group plc.

Date: 24 February 2026

Our progress in 2025

Governance:

Launched the Drax Sustainability Framework, outlining our commitments to Climate, Nature and People. The Sustainability Council reviews the progress of those commitments.

Provided bi-monthly reporting and an annual risk assessment to the Ethics and Business Conduct Committee (EBCC) on the activities of the SCHR programme.

Started developing a set of programme KPIs to allow the quantitative assessment of programme performance and the monitoring of trends.

Risk Assessment:

Continued to progress the outputs from the gap analysis of our SCHR that the Slave Free Alliance (an anti-slavery charity) completed.

Completed and presented our annual programme risk assessment to the EBCC.

Ethical Due Diligence (EDD):

Launched the Supplier Risk Matrix, which categorises suppliers by sector and level of influence as part of the initial EDD process. This enables the process of risk based and proportionate due diligence on third parties to take place before onboarding. Potential modern slavery exposure is part of the risk assessment.

Launched an enhanced EDD self-assessment questionnaire (incorporating more data points relating to modern slavery and human rights) for our higher risk supply chains.

Ethical Auditing:

Continued using third-party ethical auditing experts, to deliver our program of ethical audits on strategic suppliers in high-risk industries.

Training and awareness:

Developed a ‘Spot the signs’ poster and Business Ethics table tents that has been distributed in the UK, US and Canada to both raise awareness of Modern Slavery, and to provide useful helpline information.

Delivered multiple face-to-face Business Ethics ‘roadshows’ across the year, including at our Amite, Entwistle, Prince George, and Vancouver sites. (refer to map on page 6).

Through a partnership with ethical consultants Align, held a “Lived Experience” webinar in the US of a survivor of Modern Slavery who shared their first-hand experience of human rights abuses.

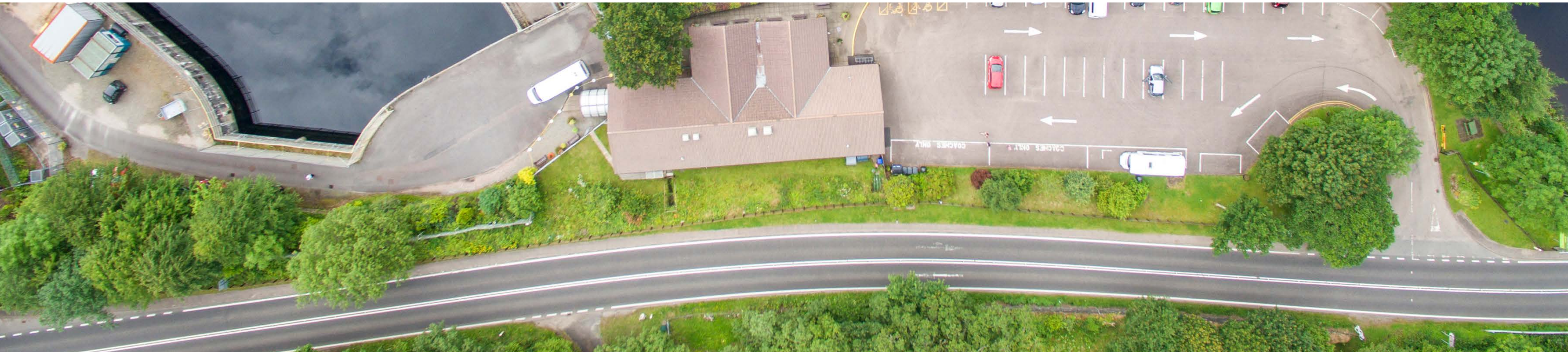
Procurement:

Initiated a Supplier Relationship Management (SRM) programme, designed to build closer working relationships with our strategic suppliers, maximise value and minimise risk.

Commenced an update on our methodology for managing critical suppliers, improving holistic risk management.

Indigenous Peoples:

Drax progressed the implementation of its Reconciliation Action Plan, which outlines 17 commitments across four key pillars: Leadership commitment, Employment, Business development, and Community relations. The plan aims to build respectful relationships with Indigenous peoples, create meaningful employment and business opportunities, strengthen cultural understanding, maintaining sustainable practices, and embed reconciliation principles into everyday operations to support lasting and equitable partnerships.



Our business and supply chain

Number of countries
in which we operate

Employees worldwide

4

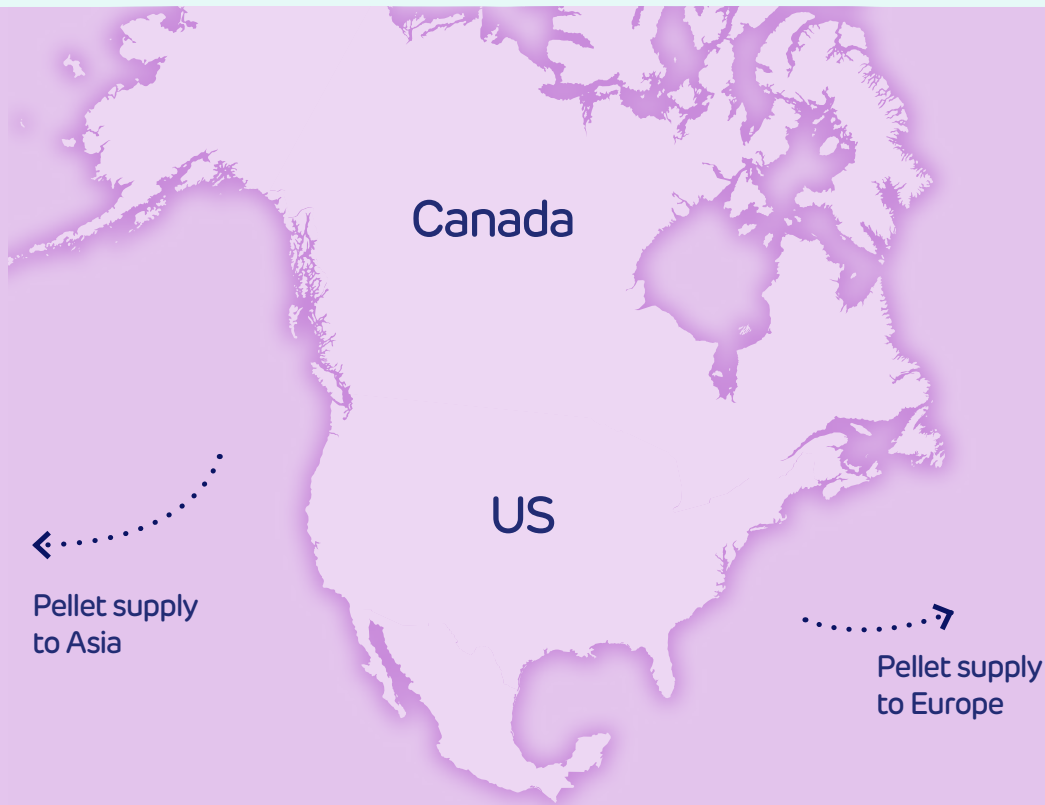
2,974

Pellet Production

A vertically integrated producer, user, buyer and seller of sustainable biomass. Producing wood pellets for use for generation at Drax Power Station and for contracted sales to third parties in Asia and Europe.

c.5Mt p.a of capacity

Across
14 plants in the USA and Canada



FlexGen & Energy Solutions

Our portfolio of flexible generation and energy solutions includes c.17GW of long- and short-duration storage and flexible generation:

0.4 GW capacity
Cruachan pumped storage hydro power station

0.1 GW capacity
Lanark and Galloway hydropower schemes

0.9 GW capacity
OCGTs (when fully commissioned)

0.7 GW capacity
BESS (when fully commissioned)

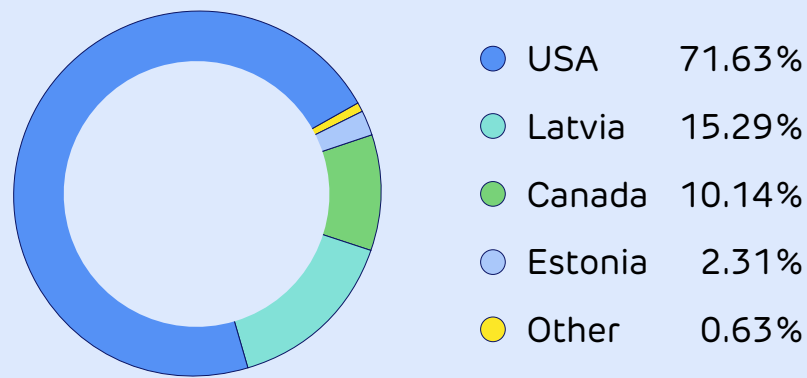


Fuel procurement

The below graphic illustrates our 2025 global fuel procurement (for consumption, third-party supply, and third party to third party trade), by percentage of volume and geography.

For further information, please refer to our latest Annual Report on the [drax.com](https://www.drax.com) website.

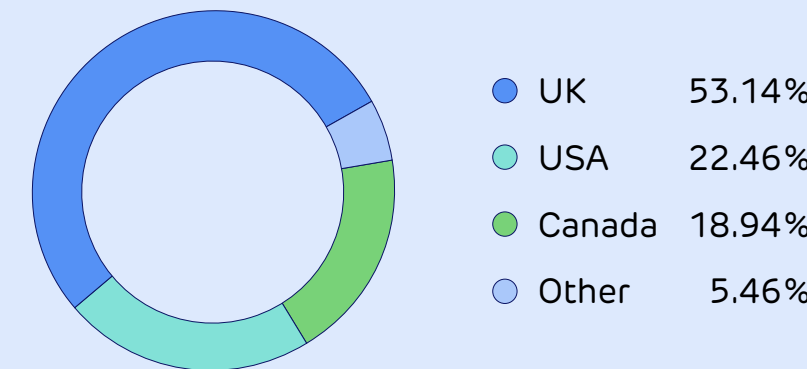
2025 global fuel procurement (for consumption, third-party supply and third party to third party trade)



Non-fuel procurement

The below graphic illustrates our 2025 global non-fuel procurement activity (with our direct suppliers). In accordance with global risk indices 100% of this spend is with low-medium risk countries.

2025 Non-fuel procurement spend % by country



Our governance

Executive Committee (ExCom)

Comprising representatives for each of our businesses and corporate functions, our ExCom is responsible for proposing company strategy and for directing and implementing Drax's day-to-day management. Our Group CEO, Will Gardiner, leads the ExCom.

Ethics and Business Conduct Committee (EBCC)

The EBCC is a sub-committee of ExCom, comprised of members of the executive team and senior leaders from across our business. ExCom sets the terms of reference for the EBCC and oversees its activity. The purpose of the EBCC is to:

- Guide and support Drax to act in accordance with our values and Code of Conduct
- Assess and oversee the Drax approach to compliance and ethics, including the compliance aspects of sustainability
- Challenge to ensure the Group acts to remedy instances where activity is not aligned, and so ensure the adequacy and effectiveness of our approach

The Supply Chain Human Rights Working Group (SCHRWG)

The SCHRWG supports the management of the SCHR programme on behalf of the EBCC, and it met seven times during 2025. It includes representation from teams across Drax, including those assessed as being 'at higher risk' of encountering human rights breaches. This assessment is based upon the nature of their engagement with current and potential partners in our supply chain. These teams include Business Ethics, Sustainability, Procurement, Logistics, Human Resources, Health and Safety, and Diversity, Equity and Inclusion (DE&I). In 2025, we extended the governance to include the Social Impact team.

Our Supply Chain Human Rights (SCHR) programme

The SCHR programme is the driving force behind activity relating to Supply Chain Human Rights at Drax. The Programme Specialist coordinates the working group, represents Drax at external working groups and forums, and produces bi-monthly reports for the EBCC plus an annual programme risk assessment. They are also responsible for updating the Human Rights policy annually, developing training on Modern Slavery, and ensuring compliance with all external reporting legislation. Their responsibilities also include producing the annual Modern Slavery Statement.



Our policies

Our Group Policy Framework details the principles that govern our policy requirements. These policies align to and support the standards set out in our Code of Conduct and Supplier Code of Conduct. In addition, there are specific processes and procedures that mandate we undertake activity in line with the policy requirements. We review our policies and processes annually, or more frequently if required, to ensure they address our current business activity. In 2025 we introduced a software solution to automate the life-cycle of our policies. Being compliant is critical to our license to operate and our policies and supporting documents are in a place to help make sure everyone know what they need to do to place a part in compliance.

Below is a summary of the policies and documents linked to our SCHR programme, some of which are publicly available. To see a policy within a new window, click its title at the head of the column, or the related image.

Code of Conduct

Summary:

Our Code of Conduct applies to all colleagues, non-permanent workers and anyone working on behalf of Drax. It sets out our key principles and the expected standards of behaviour.

How it links to modern slavery:

The Code of Conduct makes it clear that Drax will not tolerate breaches of human rights and gives details about our Speak Up reporting channels. It also covers our approach to non-retaliation, designed to encourage reporting of concerns, as well as to human and labour rights, dignity at work, diversity, equity, and inclusion.



Code of Conduct

March 2025



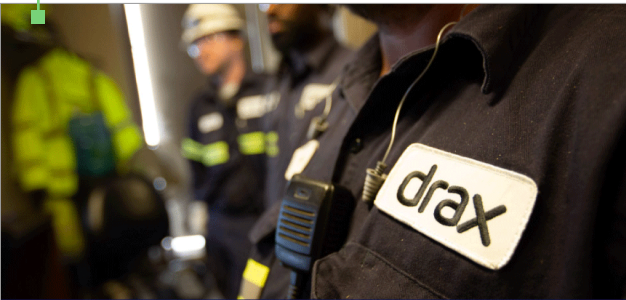
Supplier Code of Conduct

Summary:

Our Supplier Code of Conduct sets out the standards we expect of all of our supply chain partners. It informs part of relevant contracts.

How it links to modern slavery:

The Supplier Code of Conduct requires that suppliers carry out their business in accordance with applicable laws, rules and regulations. They must not breach any internationally adopted human rights principles, nor engage underage workers, nor subject any workers to any form of modern slavery. They must comply with all applicable laws in relation to working hours and remuneration, and provide a safe and healthy working environment. The Supplier Code of Conduct also encourages our UK suppliers to pay the Real Living Wage and provides details of our Speak Up service.



Supplier Code of Conduct



Human Rights policy

Summary:

Our Human Rights policy outlines the human rights standards Drax seeks to comply with, in line with the principles in:

- The Universal Declaration of Human Rights
- The International Labour Organization’s Declaration on Fundamental Principles and Rights at Work
- The European Convention on Human Rights
- The United Nations Global Compact
- The United Nations Guiding Principles on Business and Human Rights

It details our prevention and mediation approach and provides information on how to raise concerns.

How it links to modern slavery:

The policy incorporates key principles that mandate against modern slavery practices, including: a safe and healthy workplace; dignity at work; working hours; wages and benefits (fair pay); diversity, equity and inclusion; collective bargaining and freedom of association; forced labour and human trafficking; and child labour.



Human rights policy



Indigenous Peoples policy

Summary:

Our Indigenous Peoples policy outlines our commitment to effective and respectful engagement and to creating partnerships with Indigenous communities in the places where we operate or seek to do business. This reflects our continued engagement with Indigenous communities, encompassing the transparent sharing of information related to our operations, projects, and associated economic opportunities. It also underscores our commitment to collaborative dialogue and to respectfully and constructively addressing feedback in a meaningful way.

How it links to modern slavery:

Indigenous Peoples have a deep connection with, and high degree of dependence on, natural resources for their livelihoods and wellbeing. The Indigenous Peoples policy highlights our commitment at Drax to working with Indigenous Peoples in a manner that recognises and respects them throughout our engagement. It also upholds their legal, constitutional, and international rights.



Indigenous Peoples policy



Biomass Sourcing Policy

Summary

In March 2025, we published a revised Biomass Sourcing Policy that applies to all biomass the Drax Group sources. The updated policy addresses principles related to climate, nature and people including a commitment to compliance, traceability and transparency while conducting open stakeholder engagement.

How it links to modern slavery:

- As part of our biomass sourcing commitments, we:
- Promote respect for human rights, including safeguarding the labour rights of workers
 - Use certification schemes/chain of custody processes that aim to deliver traceability on both the origin of our biomass and the associated supply chain

Global Procurement policy (non-fuel)

Summary:

This policy outlines the principles we apply in procuring and/or contracting with third parties. It provides resources to colleagues to ensure they appropriately assess suppliers and outlines the governance required before we make any commitments.

How it links to modern slavery:

The policy instructs colleagues how to apply our due diligence appropriately. We updated our Global Procurement policy in 2025 to emphasise a greater focus on ethical due diligence throughout our supplier onboarding process, further promoting our existing ethical due diligence policies and guidelines.

Safety, Health and Wellbeing policy

Summary:

Our combined Group-wide Safety, Health and Wellbeing policy outlines our ‘OneSafeDrax’ vision. It also states our commitments to ensure that everyone – regardless of location or role – goes home safe and well at the end of every day. It promotes and supports holistic wellbeing, taking ownership, speaking up for safety, and proactively managing risks.

How it links to modern slavery:

Our people are at the heart of everything we do, and colleague wellbeing is important to our overall success. The Group policy, signed by the Chair of our Board and our CEO, sets out what we aim to achieve in these areas. It also emphasises that every Drax employee plays a key part in their own safety, health and wellbeing and that of their colleagues.

Speak Up (whistleblowing) policy

Summary:

This policy commits to creating a culture where everyone who works for, and with, Drax can confidentially raise concerns and be safe from any form of retaliation or victimisation. These concerns may be about anything that might contradict the principles set out in our Code of Conduct. Multiple reporting channels are available, including 24-hour global hotlines provided by a specialist third-party whistleblowing service provider which allows for anonymous reporting. Drax welcomes the reporting of concerns and recognises that people who Speak Up help to reveal potential problems and allow for prompt and effective resolutions.

How it links to modern slavery:

The programme ensures that our colleagues, suppliers, communities, and others have a means of reporting concerns (including any in relation to modern slavery).





Our people

People Positive

At Drax, our mission is to help meet the world’s increasing demand for secure energy sustainably. For us, sustainability isn’t about words, it’s about action- to benefit the climate, nature and people.

We launched our Sustainability Framework in 2025. It sets out how we’re taking action to help decarbonise our operations, to protect and enhance nature, and to support people who work with and alongside us. In terms of our people positive actions:

- We will keep building a fair, safe and inclusive workplace.
- We will continue to collaborate with our supply chain to promote fundamental human and labour rights, including those covered by the UN Global Compact and the UN Declaration on the Rights of Indigenous Peoples.
- We will partner with the communities we operate in, seeking to make a positive contribution to their lives and livelihoods

We take a value chain approach to People Positive, meaning we are committed to considering the needs of all stakeholder across our operations. This includes all Drax colleagues and contractors, businesses in our supply chain, and communities near our operational site across the UK, US and Canada.

Click to view [Our Sustainability Framework](#).

Health and Safety

The International Labour Organisation (ILO) recognises a safe and healthy work environment as a fundamental principle and right at work.

Our Group Safety, Health and Wellbeing Policy, supported by our OneSafeDrax vision, outlines how all employees and contractors have a role to play in keeping themselves and their co-workers safe. To enable ongoing compliance and meet expectations, site and business unit level Health and Safety performance is reviewed regularly and Group performance is appraised monthly with ExCom and quarterly by Group HSE Committee. The CEO regularly reports on Health and Safety to the Board, with an HSE performance metric being a constant in our Group Scorecard.

In 2025, we transitioned to a functional HSE model to drive consistency and alignment across all business units. The functional model provides integrated strategic oversight across all aspects of Health and Safety. These aspects include occupational health and safety, process safety, environmental stewardship and governance. This bolsters our ability to to manage risk proactively, share best practices effectively, and stay aligned with evolving regulatory requirements.

Our operational UK Generation assets have an integrated HSE management system certified to ISO 9001:2015 (Quality Management Systems), ISO 14001:2015 (Environmental Management Systems), and ISO 45001:2018 (Occupational Health and Safety Management Systems). Our Pellet Production sites align to one HSE management system, which sits across both the US and Canada.

Recruitment

Within our recruitment procedures, we have processes designed to identify and reduce the risk of modern slavery.

- We conduct “right to work” and pre-employment checks to verify the identity of prospective colleagues and check their immigration status and age.
- Agencies supplying non-permanent workers are also required to carry out equivalent right to work and pre-employment checks.
- We ensure that an employment contract (offer letter in the US), or other local equivalent, is in place before an individual starts their employment with Drax. We encourage our suppliers in the UK to pay the Real Living Wage; these suppliers contract staff to work for, or on behalf of, Drax for two or more hours a week, for eight consecutive weeks a year. In the UK, we pay our colleagues the equivalent of the Real Living Wage applicable to their role (as a minimum). Through our ethical audits, we have also started to test suppliers’ processes in this space

My Voice surveys and forums

My Voice refers to our listening channels which enable colleagues to provide feedback about working at Drax.

In line with our listening strategy and to measure our progress on developing our desired culture, we carried out quarterly My Voice surveys in February, May, August and November 2025. These surveys measure our key drivers of engagement, DEI, health and wellbeing, and transformation and change. The surveys measured our key drivers of engagement, DEI, health and wellbeing and transformation and change, with the results reported to ExCom.

Diversity, Equity & Inclusion (DE&I)

The core human rights principles of the Universal Declaration of Human Rights (UDHR) are centred around equality and non-discrimination.

We have a DEI strategy and action plan that we implement in partnership with our Colleague Resource Groups and the wider organisation. Together, we are working towards building a Drax where fairness is visible in every decision, psychological safety defines how we lead, and inclusion and access are simply how we work.

This includes fair approaches to hiring and includes the “Hiring the Drax Way” programme launched in 2025. It also encompasses the introduction of new training, tools (such as a values-based assessment) and templates to ensure fair, consistent hiring.

Our My Voice forums help the Board to connect with colleague sentiment and organisational culture. With ongoing support from the ExCom sponsor Paul Sheffield, a refreshed group of Co-Chairs received training in how to constructively challenge, and hold to account, the CEO and Chair. In October, they discussed the impact of recent organisational design announcements and strategic decisions that are part of the ongoing Future Focus programme.





Community engagement

Community engagement in our operational footprint creates open dialogues and feedback loops for possible grievances and risks, including potential concerns about modern slavery. We are on track to meet our public commitment to have community engagement plans in each of the communities where Drax owns and operates an asset by the end of 2027.

In the UK, we have teamed up with a local third sector organisation to pilot a place-based approach to community engagement and social investment. As a first step, we have conducted community surveys and listening sessions to identify local needs and priorities in the communities surrounding Drax Power Station.

In the United States, we have made significant progress during 2025 to expand community engagement and outreach in the areas where we operate. In Louisiana,

this included holding two focus groups to improve our understanding of local needs and concerns. It also involved more than 10 school visits across operations in Morehouse, LaSalle and Monroe, and participation in more than 20 expos and community events. Our Community Liaison Officer has also conducted meetings with more than 30 local leaders, economic development directors and non-profit leaders.

In Mississippi, we held three Community Advisory Panel meetings during 2025 and participated in more than 15 community events and met with more than 30 local community leaders. During 2025, we also developed a new relationship with Historically Black Colleges and Universities (HBCUs) in Alabama, Arkansas, Louisiana and Mississippi and provided scholarship funding from the Drax Foundation.

Freedom of association and collective bargaining

At Drax, we respect the rights of our colleagues to freedom of association and collective bargaining. 16% of our UK workforce is covered by a collective bargaining agreement, 4% in Canada, and currently no colleagues in the US.

We maintain regular dialogue with trade union representatives and hold bi-monthly meetings to discuss matters of interest to union members and the wider workforce. These exchanges may concern safety or managing change in our operations, and there is also an annual discussion about remuneration. We carry out annual pay bargaining negotiations for those colleagues covered by that within their collective agreement.

Indigenous rights and engagement

In 2025, Drax progressed the implementation of its Reconciliation Action Plan. This plan outlines 17 commitments across four key pillars: Leadership commitment, Employment, Business development, and Community relations.

We strengthened these commitments through a series of initiatives, including a cultural awareness training for Drax employees and ongoing engagement with Indigenous partners. We also unveiled territorial acknowledgement plaques across all our Canadian locations and introduced an Indigenous internship program.

In addition, we signed an agreement to become a committed-level member of the Canadian Council of Indigenous Businesses (CCIB) Partnership Accreditation in Indigenous Relations (PAIR) program. This promotes a greater understanding of Indigenous Peoples’ history, culture, and rights.

This year, our Indigenous Advisory Committee (IAC) met eight times to provide valuable guidance and insight. The Drax Indigenous Relations team actively participated in community events, reinforcing its commitment to building respectful and collaborative relationships.

In 2026, Drax will place increased focus on creating procurement opportunities for Indigenous businesses and entrepreneurs. This aims to ensure that business growth is inclusive, equitable and community driven, and upholds human rights.



Our risk assessment and due diligence

The Drax global supply chain spans multiple territories and industry sectors – including forestry, manufacturing, freight and logistics, engineering, construction, IT, and site services. We recognise that as our business grows, so too does the

complexity of our processes and interactions, increasing our ethical risk. This means it is essential that we continue to evolve our risk assessments and practices.

Risk assessment

The areas that we have identified as giving rise to the highest risk of Modern Slavery are:

Third-party workers

The risk:

The reliance on outsourced contractors and temporary labour via third parties creates a layer of separation between companies and workers and, potentially, limited visibility into recruitment practices. The roles in question are often lower skilled and lower paid, which also increases vulnerability to exploitation practices.

In accordance with the Utilities Against Slavery (UAS) working group guidance, Drax has identified the following high-risk industries as an area of focus.

- Construction
- Facilities
- Logistics
- Apparel
- EVs

How we are reducing that risk:

In 2025, we audited suppliers in all these focus areas to obtain a greater insight into third-party practices. We also launched our enhanced ethical due diligence questionnaire, to gain greater transparency of suppliers’ commitments to human rights.

Goods Not For Resale (GNFR)

The risk:

Poor visibility of potentially long and complex supply chains increases the risk of human rights and worker abuses taking place.

How we are reducing that risk:

The ongoing Drax program of ethical audits in 2025, and our enhanced ethical due diligence questionnaire, has resulted in greater transparency of suppliers’ commitments to human rights, which we plan to build on in 2026.

Biomass

The risk:

The materials sourced for biomass pellets are mainly from remote locations, where there’s potential for the use of migrant workers. Having poor visibility of such suppliers (due to their location) may increase the risk of worker abuses taking place. Due to the purchasing practices of sourcing materials for biomass (i.e. Drax purchases the thinnings and residues of the forest and timber industries rather than the primary material), the biomass pellet industry is not the primary buyer and therefore has less influence over the supply chain.

How we are reducing that risk:

At the end of 2025, 100% of the suppliers of woody biomass to Drax Power Station (DPS) are SBP certified; this accounts for 95.45% of total biomass supplied to DPS. SBP proactively encourages the adoption of standards and due diligence processes, including the promotion of human rights, and 2025 saw the deadline for certificate holders to transition to revised standards. These revisions included strengthened social requirements – such identifying, documenting and respecting the legal, customary and traditional tenure and use rights of Indigenous Peoples and local communities – as well as working conditions, minimum wages, and benefits for communities. For suppliers to be approved under the certification scheme, they must satisfy multiple requirements, including those aligned with modern slavery due diligence. The SBP website has further information: <https://sbp-cert.org/>

The certification scheme also requires certification holders to maintain their status by undergoing annual surveillance audits by an independent certification body. There must be a total of at least four surveillance evaluations within a certificate’s five-year duration.





Due Dilligence

Ethical Due Diligence

At Drax, we have an established Ethical Due Diligence (EDD) Framework and EDD Guide. These set out our risk-based and proportionate EDD and guidance for requesting EDD on a third party and establish our escalation protocol.

In 2025, there was an update to our third-party due diligence screening system, focused on the key indicators of business ethics risks and reducing false positive alerts. A refresh of our existing third-party due diligence risk screening supports the identification of emerging risks and updates our continual risk system monitoring.

Country risk approval

Global rights indices support our risk assessment of potential suppliers. Where we identify higher risks, we escalate and pursue enquiries directly though our dedicated EDD process supported by subject matter experts within the Business Ethics team. Our EDD Framework requires that we appropriately review any higher risk countries before accepting any third-party relationships.

We use a third-party focused country risk assessment tool. This allows Drax to assess countries/regions against multiple risk indices, to determine whether we consider it appropriate to undertake business there.

Second line assurance activity

We conduct a sample of second line activity to assess the extent to which supplier onboarding and payment recipients have been subject to the appropriate due diligence. This allows us to assess the effectiveness of our EDD processes and so inform remedial action where required to support our continual improvement.

Third party acceptance and data

Based on our risk categorisation of third parties, which we updated in 2025, we carry out risk-based and proportionate due diligence on third parties presented for onboarding. This ensures we can assess any associated persons and supply chains where required.

The EDD guide (which forms part of the EDD Framework) outlines our approach to third-party ethical due diligence and how to undertake it. Although our colleagues currently drive this process, we're working on it becoming a mandatory step, prior to third party onboarding.

Our internal escalation process enables us to collaborate with third parties and our business ethics subject matter experts, where we identify risks. If required, we seek final approval from the Ethics and Business Conduct Committee (EBCC).

In 2025, Drax began the process of cleansing legacy, third-party supplier data and will continue investing in further improvements.

Enhanced self-assessment questionnaires

Our 2025 supplier categorisation matrix and due diligence questionnaire dive more deeply into potential risk indicators. By putting key questions to our higher risk third parties, the questionnaire provides insights to their own policies, controls and supply chains. This gives us the data we need to further assess our risks.

Ethical Audits

We have strengthened our supply chain auditing and verification processes. See page 32.

Gap Analysis

In 2024, we concluded a gap analysis on our Supply Chain Human Rights Programme with the charity Slave-Free Alliance (SFA). The analysis provided an independent review of our understanding about, and response to, human rights risks and highlighted 27 opportunities for strengthening our controls.

We have started to address 90% of these actions, including the six highest priorities where we can have the most impact. For example, we have worked on our Responsible Sourcing strategy (including human rights) and gained greater insight into suppliers' commitments to human rights. We have also conducted a training needs analysis to identify roles within our business that carry a higher risk of encountering Modern Slavery.

We have embedded all the opportunities for strengthening controls into our SCHR Programme, and we will continue to make progress on them throughout 2026.

Modern slavery instances

In 2025, our EDD processes did not identify any instances of modern slavery in our supply chain.

If we discover a human rights breach, we have a remediation procedure (approved by the EBCC) that we would seek to follow in conjunction with the relevant third party.

Our awareness and training

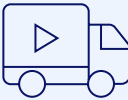
In 2025, we:



Designed and distributed a Modern Slavery and Human Trafficking 'Spot the Signs' poster (opposite) across the business. These were displayed inside toilet cubicles (to provide privacy to view and record sensitive information) and in public spaces across the business to raise awareness. This included details of national helplines and emergency services in the UK, US and Canada.



Held a company-wide webinar with a survivor of Modern Slavery in February (known as a 'Lived Experience Consultant') who shared their first-hand experience of labour exploitation and debt bondage. The purpose of the webinar was to bring real situations to life for the audience and to raise awareness of spotting the signs.



Delivered Business Ethics Roadshows in the US and Canada (including SCHR content).



Deployed our annual Code of Conduct refresher eLearning to all colleagues across Drax (including SCHR content).



Deployed Business Ethics for Senior Leaders training (including SCHR content) to our senior leadership team.



Marked Anti-Slavery Day with an event – which the Utilities Against Slavery Working Group hosted – focused on tackling modern slavery through information, action, and industry collaboration.



Rolled out our Modern Slavery training module to all new starters in teams considered 'at higher risk' of encountering potential SCHR issues.



Modern Slavery and Human Trafficking.
Spot the signs

Modern Slavery is where one person controls another for profit by exploiting a vulnerability. Usually the victim is forced to work or is sexually exploited, and the trafficker keeps all or nearly all of the money. The control can be physical, financial or psychological.

Look at out for signs that could indicate Modern Slavery

	Wellbeing	Does the individual wear the same clothes every day?	Are they appropriately dressed for the weather and job they're undertaking?	Do they appear untidy or unclean?	Are they showing signs of abuse or recent injuries?
	Work	Have you noticed that they're always on shift?	Do they appear to be working long hours with little time-off?	Do they have the right equipment?	Are they wearing PPE? Is the PPE brand new and showing signs it's not often used?
	Money	Are they having difficulty paying for lunch?	Have you noticed that they're not in the possession of a wallet/ bank cards/ personal ID?	Have they mentioned repaying a loan?	
	Housing	Are they unfamiliar with their surroundings or even their own address?	Do premises you're visiting show signs of people sleeping there?	Have you noticed multiple workers living together?	
	Travel	Are people being transported to and from work by others?	Are they being transported in groups?	Have they disclosed they paid a 'recruitment fee' for the job?	Has international travel for this job come into conversation?
	Behaviour	Are they unfamiliar with the local language?	Do others always speak on their behalf?	Do they keep themselves isolated from others and not join in conversations?	



Speak Up

You may have seen one or more of these signs. To report a concern, no matter how small, or to find help, please contact Business Ethics on: Business.Ethics@drax.com

Alternatively call the Modern Slavery Helpline (24/7):
08000 121 700



Scan the QR code to find out more

Speak Up hotline:
0800 915 1571

www.safecall.co.uk/file-a-report/
or email speak.up@drax.com



Scan the QR code to find out more



Our Speak Up procedures

Drax positively encourages everyone to do the right thing, always. If anyone sees something that might not be right, we support them in speaking up about it without fear of retaliation or victimisation.

We want everyone to report concerns of possible wrongdoing as soon as possible, so that we can effectively resolve matters. This supports our commitment – in the Drax Code of Conduct and Supplier Code of Conduct – to do business with honesty and integrity, in accordance with all relevant laws and regulations. Anyone, anywhere in the world, can report concerns (anonymously if they wish) using our confidential, 24/7 Speak Up service. It’s available in over 175 languages via <https://www.safecall.co.uk/file-a-report/>.

The Drax Whistleblowing Officer maintains independent oversight of the remediation of Speak up concerns and the outcomes are reported to the EBCC, ExCom, Board and Audit Committee.

In 2025 our speak up service received no reports that related to Human Rights concerns.

Our partnerships

Eliminating Modern Slavery from the Global economy is a long-term commitment and cannot be achieved in silo. Drax adopts a partnership approach to maximise our impact. Here is a summary of our 2025 partners and activities:

Sustainable Biomass Program (SBP)

What is it?

SBP is an independent certification scheme for the woody biomass (mostly wood pellets and wood chips) used in the industrial, large-scale production of biomass for electricity generation.



How it supports our work to monitor and evaluate the risks to modern slavery:

SBP encourages the adoption of standards and due diligence processes, including the promotion of human rights. It revised and strengthened standards in 2025, including the introduction of processes to identify, document and respect Indigenous and local community land-use rights,, working conditions, minimum wages, benefits for communities.

United Nations Global Compact (UNGC)

What is it?

UNGC is the world’s largest corporate voluntary sustainability initiative. It urges companies to adopt and report on sustainable and socially responsible practices.



**United Nations
Global Compact**

How it supports our work to monitor and evaluate the risks to modern slavery:

Drax has been a participant of UNGC since 2018, and we will continue into 2026. Our annual “communication on progress” can be viewed can be viewed at unglobalcompact.org.

As a member of the Modern Slavery working group, we have the opportunity to collaborate with peers and share best practice for addressing modern slavery in supply chains. The working group also hosts leading guest speakers each quarter and provides a platform for discussing challenges. In 2025, Drax took part in a peer review of our 2024 Modern Slavery Statement.

Slave Free Alliance (SFA)

What is it?

SFA is a non-profit group wholly owned by global anti-slavery charity Hope for Justice. Through SFA, Drax is a member of the Utilities Against Slavery (UAS) working group, comprising 14 utility companies from across the UK.



**SLAVE-FREE
ALLIANCE**

Working Towards a
Slave-free Supply Chain

How it supports our work to monitor and evaluate the risks to modern slavery:

In 2025, UAS focused on three key areas: supply chain; engagement; and training. Members of UAS reviewed our ‘at higher risk’ procurement sectors list, which we adopt as part of our risk assessment process.

Mission to Seafarers & Stella Maris

What is it?

Mission to Seafarers and Stella Maris are independent charities working in the seafarer welfare sector, serving merchant crews around the world. The charities provide practical, emotional and spiritual support to Seafarers. Although the charities are individual they work closely together, often coordinating efforts and looking for opportunities to partner together on specific projects.



How it supports our work to monitor and evaluate the risks to modern slavery :

By supporting Mission to Seafarers, we gain valuable insight into real issues and risks at sea through the charity’s experience and close engagements with seafarers. As connectivity remains a high priority for seafarers, we continued to support the funding of MiFi units to the charity in 2025, to enable crews to utilise free Wi-Fi while docked at the ports of Immingham and Hull. (Over 60% of the sustainable wood pellets that Drax uses in the UK are delivered via the River Humber and these ports).

In December 2025, Drax contributed funding to support 600 Christmas parcels for seafarers at the ports of Immingham and Hull. A number of our colleagues volunteered, across two days, to pack and deliver the gifts.

Align

What is it?

Align Ltd is an ethical consultancy that accelerates the inclusion of experts with lived experience of modern slavery in businesses.



How it supports our work to monitor and evaluate the risks to modern slavery:

The inclusion of Lived Experience is vital in helping organisations to understand the risks posed to workers and to drive effective and people centered outcomes. It is also heavily endorsed in the updated 'Transparency in supply chains' government guidance.

For International Anti-Slavery Day, we hosted a webinar with a Lived Experience Consultant who shared their harrowing, first hand experience of labour exploitation and debt bondage. The purpose of this collaboration with Align was to provoke thoughts across the business and to demonstrate to colleagues that exploitation can live in plain sight.

Arche Advisors

What is it?

Arche Advisors is a group of third-party ethical auditing experts that we started working with in 2024. The organisation helped us develop a supplier audit, based on our Supplier Code of Conduct, legislation and ethical best practice.



How it supports our work to monitor and evaluate the risks to modern slavery:

Our programme of ethical audits tests suppliers' compliance against our Supplier Code of Conduct and provides insight into wider industry issues. The audit reports allow Drax to work directly with suppliers to make meaningful change and replicate learnings across our wider supply chain.



Our effectiveness

Measuring our progress in 2025

- Metric: [Provide proportionate levels of training to colleagues, including new starters, senior management and teams considered ‘at higher risk’ of encountering modern slavery](#)
- Continued to deploy the Code of Conduct to new starters
 - Deployed Code of Conduct refresher training (including SCHR content) to existing colleagues across Drax
 - Deployed Modern Slavery training to new starters in teams considered ‘at higher risk’ of encountering supply chain human rights issues
 - Deployed ‘Business Ethics for Senior Leaders’ refresher training (including SCHR content) to our Senior Leadership team
 - Delivered multiple face-to-face Business Ethics Roadshows (including SCHR content)
- Metric: [Modern Slavery investigations outstanding](#)
- Nil
- Metric: [Maintain up to date due diligence information on supply chains that are high risk for modern slavery](#)
- In 2025, we updated our Country Risk Matrix and identified, of those suppliers put through the Ethical Due Diligence process, we have eight suppliers in medium risk countries. Through our EDD process, we also identified 85 suppliers as a high-risk sector. We assessed and accepted all these suppliers and use our EDD system to continually monitor them for emerging risks.
- Metric: [Collaborate with others to promote awareness of modern slavery](#)
- Continued engagement with UN Global Compact, Slave Free Alliance and Unseen
 - Joined the Institute of Human Rights and Business (IHRB) action group on “Seafarers Responsible Recruitment”, which focuses on illegal recruitment fees.
- Metric: [Proportion of woody biomass pellets used at Drax Power Station with an SBP compliant claim.](#)
- 99.9%
- Metric: [Strengthen supply chain auditing and verification processes](#)
- Worked with third-party ethical auditing experts (Arche Advisors) to audit six suppliers across the UK, US and Canada operating in industries considered at higher risk of modern slavery. Suppliers welcomed the audits, which highlighted both good practices and potential areas for improvement. We continue to work collaboratively with suppliers to promote fundamental human and labour rights.
- Metric: [Completion of Code of Conduct refresher training by relevant colleagues](#)
- 99.2%
- Metric: [Time elapsed since completion of latest SCHR programme risk assessment](#)
- We last completed the Annual SCHR programme risk assessment in November 2025



Our focus for 2026

In 2026, our focus will be to:

- Strengthen transparency of our high-risk supply chains .
- Support the delivery of our People Positive commitment within the Sustainability Framework.
- Extend Modern Slavery training to our suppliers.
- Embed the escalation and remediation plan across Drax.

Our Statement scope

This Statement applies to Drax Group plc and the following subsidiaries:

- Drax Biomass Inc.
- Drax Power Limited.
- Drax River Hydro Limited.
- Drax Pumped Storage Limited.
- Opus Energy Limited.
- Opus Energy Renewables Limited.
- Drax Energy Solutions Limited.
- Pinnacle Renewable Energy Inc.
- Demopolis Pellets LLC.
- Alabama Pellets LLC.

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