



GREEN BRITAIN GROUP

Modern Slavery and Human Trafficking Statement Financial year 2025–26

1. About this statement

This statement is made by Green Britain Group Limited on behalf of itself and the Green Britain Group companies covered by it (together, the “Group”) pursuant to section 54(1) of the Modern Slavery Act 2015. It describes the steps taken during the financial year 2025–26 to identify and address the risk of slavery and human trafficking in the Group’s operations and supply chains.

We are committed to respecting human rights and reducing the risk of modern slavery. We recognise that modern slavery risks cannot be eliminated through policy statements alone. Our existing policies, procedures, awareness materials and risk-based supplier checks provide a foundation for addressing modern slavery risk. We recognise that these arrangements require further formalisation, more consistent documentation and improved measures of effectiveness across the Group. During 2025-26, we maintained those existing arrangements and began work to consolidate and strengthen them. This statement sets out the steps actually taken during the year, the limitations we have identified and our priorities for further improvement.

This statement does not claim that modern slavery does not occur, or could not occur, in our operations or supply chains. We regard transparency about the maturity and limitations of our arrangements as an important part of improving them.

2. Organisation, business and supply chains

Green Britain Group Limited is the owner of the Ecotricity group of companies. The Group operates principally in the United Kingdom and has activities in renewable energy, energy storage, transport, food, sport, telecommunications, sustainable diamonds, sustainability accreditation, carbon reduction and creative services. The Group employs approximately 1,000 people.

Group companies include Ecotricity Limited, Forest Green Kitchen Limited, Britwind Limited, The Sky Mining Company Limited, Forest Green Rovers Football Club Limited, GreenCode Sustainability Limited, Ecotalk Limited, Carbon Bank Limited and Green Knight Studios Limited. Some of the smaller Group companies do not independently fall within the mandatory reporting obligation. Relevant Group policies, guidance and reporting arrangements apply across the Group, with their practical application reflecting the activities and risk profile of each business.

Most Group operations, including manufacturing activities, take place in the UK. The Group also procures specialist services, raw materials and components from outside the UK, including items used to build or maintain generating assets, and some Group companies export manufactured products internationally.

Our supply chains include providers of raw materials and manufactured components, construction and maintenance services, technology and telecommunications services, food ingredients, facilities and professional services, and labour or recruitment services. Our visibility is currently greatest in relation to direct suppliers. We do not yet have comprehensive, consistently recorded information about all supplier tiers, sourcing locations or workforce arrangements across the Group, and improving that visibility is a priority.

3. Policies relating to modern slavery

Our current arrangements are supported by a number of existing policies, procedures and guidance documents, including our Modern Slavery Awareness and Victim Identification Guidance, colleague induction materials, Whistleblowing and Grievance policies, recruitment controls, working-time monitoring and policies intended to protect colleague welfare and safety.

These existing policies, procedures and guidance provide a Group-wide foundation for identifying, reporting and responding to concerns. During 2025–26, we identified opportunities to consolidate these arrangements within a clearer overarching Modern Slavery Policy and to improve the consistency with which their operation is documented, monitored and reviewed across different businesses. The Modern Slavery Policy remained under development during the reporting period and had not yet been fully implemented across the Group.

Our policies and guidance are intended to help colleagues raise concerns safely, promptly and confidentially. We will continue to clarify ownership, escalation routes and the application of these arrangements to suppliers and contractors.

4. Risk assessment and management

Our approach to modern slavery risk assessment is under continual development. We consider factors such as the country of origin, the sector concerned, the nature of the goods or services supplied and any known reliance on labour-intensive, temporary or subcontracted work. These considerations may inform whether additional enquiries are made before or during a supplier relationship.

We continued to use existing procedures to identify, assess, mitigate, record and monitor potential risk areas and red flags. These procedures were not supported during 2025-26 by a single comprehensive methodology or centralised assessment covering every Group business, supplier category and tier of the supply chain. Our focus is therefore on improving consistency and documentation rather than replacing the existing risk-based approach.

On the information currently available, areas that may warrant closer attention include internationally sourced raw materials and components, manufacturing, construction and maintenance activities, food supply chains, facilities services and labour or recruitment providers. Identifying a category for closer attention does not mean that modern slavery has been found within it; it reflects the need for proportionate scrutiny where sector, location or workforce characteristics may increase potential exposure.

We also monitor colleague working hours and have systems intended to flag hours or shifts exceeding relevant limits. These controls support colleague welfare but are not, by themselves, a complete modern slavery risk-management system.

5. Due diligence

Consistent with our approach in previous years, potential suppliers identified as operating in higher-risk countries, sectors or activities may be subject to additional assessment and approval before engagement. Depending on the circumstances, this may include desk-based research into the supplier's country and sector and supplier questionnaires addressing relevant policies and practices. These enhanced checks are risk-based. During 2025-26 we began reviewing how suppliers are

identified for enhanced assessment and how the checks are completed, decisions reached and any follow-up actions are recorded across the Group.

Our developing approach is to respond proportionately to the circumstances. Available responses may include seeking further information, agreeing corrective action, obtaining specialist advice, reconsidering the relationship or reporting matters to an appropriate authority. Any response should take account of the safety and interests of potential victims.

We aim to develop and operate a comprehensive programme of supplier audits to improve our visibility beyond direct suppliers.

6. Reporting concerns and responding to incidents

Colleagues may raise concerns through available management, People Team, grievance and whistleblowing channels. The Modern Slavery Awareness and Victim Identification Guidance available on the Group intranet also explains how potential indicators can be recognised and reported.

The People Team is equipped to receive employee concerns safely, promptly and confidentially and may involve other appropriate functions where further assessment is required. Material strategic risks are escalated to the Board where appropriate. During 2025-26, we began considering how these existing procedures could be supplemented by clearer modern slavery specific guidance on escalation, remediation, external referral and the recording of outcomes.

Where a concern indicates an immediate risk of harm or possible criminal conduct, the Group would seek appropriate specialist advice and consider referral to the relevant authorities. We intend to develop a clearer victim-centred response and remediation framework during the next reporting period.

7. Training and awareness

Modern slavery awareness is included in the colleague induction programme, and guidance on recognising and reporting potential concerns is available to colleagues through the Group intranet. These arrangements provide foundational awareness across the Group. Our intention going forward is to supplement them with a targeted training programme for all managers.

During 2025–26, the Group worked on more specific materials for hiring managers. We intend to work on ways to centrally analyse training completion and understanding in a way that enables comprehensive Group-wide reporting.

8. Measuring effectiveness

We review our approach to the identification and mitigation of modern slavery risk when preparing the annual modern slavery statement, with input from colleagues across the organisation. The review informs proposed changes to relevant policies, procedures, awareness materials and supplier processes.

Our established annual review remains principally qualitative. Although identified concerns and risks can be recorded and escalated under existing procedures, we intend to develop a comprehensive set of centralised Group-wide indicators through which to assess trends, coverage and outcomes quantitatively.

Existing procedures allow identified concerns and material risks to be recorded and escalated. We intend to develop more comprehensive, centralised management information showing the number, nature and outcome of modern slavery enquiries, supplier reviews and concerns across all Group businesses.

During the next reporting period, we intend to establish a proportionate baseline using measures such as completion of targeted training, the number of suppliers screened or referred for enhanced review, the outcome of due diligence enquiries, concerns raised and progress against improvement commitments. The absence of reported concerns will not, by itself, be treated as evidence that no risk exists.

9. Priorities for 2026–27

We intend to continue developing our approach during 2026–27. Our priorities are to:

- finalise, approve and begin implementing an overarching Group Modern Slavery Policy;
- document executive and operational ownership of modern slavery risk;
- map priority supplier categories and improve information about sourcing locations and workforce models;
- formalise and improve the consistency of existing risk-based supplier screening, questionnaires and escalation criteria;
- begin development of a programme of supplier audits;
- review the use of appropriate modern slavery provisions in relevant supplier contracts;
- develop and launch targeted training for people managers;
- improve the central recording and reporting of concerns, due diligence activity, decisions and outcomes; and
- establish a small set of practical measures against which progress can be reported in the next statement.

These priorities reflect the current maturity of our arrangements. We will keep them under review and report transparently on progress, including any material limitations or delays.

10. Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year 2025–26.

This statement was approved by the Board of Directors of Green Britain Group Limited on 22 October 2026.

Signed: 
Asif Rehmanwala
Director

Date: Oct 22, 2026

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Final Audit Report

2026-10-22

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