



Modern Slavery Statement

Date: 30 June 2026



1.0 Introduction

This statement is made pursuant to Section 54(1) of the *Modern Slavery Act 2015* and constitutes both Solar Holdings Topco Limited's and SLR Consulting Limited's modern slavery statement for the financial year ending 2 January 2026. It sets out the steps taken during the financial year to prevent slavery from taking place in any part of its business, including its supply chain, and the ways it has sought to minimise the risks of any association with practices which undermine the principles of safety and dignity for its customers, employees and business partners.

2.0 About SLR/Organisation Structure

SLR is an independent, environmental and strategic advisory consultancy with a reputation for providing high quality tailored services to its clients.

Solar Holdings Topco Limited is the parent company of SLR. SLR Consulting Limited is SLR's principal operating subsidiary, which employs approximately 1,664 staff across 25 offices located in England, Wales, Scotland and Northern Ireland. In the context of this statement, reference to SLR refers to both Solar Holdings Topco Limited and SLR Consulting Limited.

More information on SLR can be found by visiting our website at www.slrconsulting.com.

3.0 Relevant Philosophies and Principles

SLR is proud of the ethical standards it has developed over many years and believes that these standards are consistent with the underlying principles of the *Modern Slavery Act 2015*.

SLR adopts and operates a 'one team' culture that fosters and encourages openness whereby all individuals can feel safe to discuss their opinions, views and/or concerns without fear of reprisal, subsequent discrimination or disadvantage. We believe this approach helps us to maintain a culture built on trust and openness under which the aiding, abetting, counselling or procurement of forced labour and human trafficking would not be tolerated under any circumstances.

As a provider of professional consultancy services, SLR does not have a particularly long or complex supply chain; our main suppliers are providers of niche consultancy services, drilling and laboratory testing services, office supplies, IT services and equipment and facilities management services. The majority of our supply chain is based in the UK, and the occasions on which we employ suppliers from high risk countries are minimal. SLR realises that slavery and human trafficking can occur in many forms such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse, but due to the specific nature of our business, we believe that there is a low risk of these sorts of practices occurring in our business and supply chain. Nevertheless, we are committed to preventing these practices from occurring within both our business and our supply chain. This risk is further mitigated by SLR's culture (see above) and our policies, as outlined below.

4.0 Relevant Policies

SLR has developed a suite of policies which sets out how our activities are undertaken to deliver on our commitment to operate in a manner which is ethical and equitable to all our stakeholders, including ensuring compliance with the *Modern Slavery Act 2015*.

These include the following:

- **Global Code of Conduct and Ethics** – Adoption and acceptance of this policy is mandatory for all SLR staff. The policy is regularly reviewed and updated, most recently in January 2026, and states that SLR will not engage in business with any contractors/sub-contractors, sub-consultants, suppliers or agents who are not able to demonstrate a similar commitment to that of SLR in operating in a fair, honest and equitable manner. In addition, its human rights' commitments are set out in this policy – this provides that SLR is committed to conducting its business at all times in a manner which treats individuals with respect and dignity, as set out in the Universal Declaration of Human Rights ("UDHR"), the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's ("ILO") eight core conventions, and the ILO Declaration on Fundamental Principles and Rights at Work. SLR also expects suppliers to adhere to the same standards in human rights protection and where local requirements are not aligned, we aim to enforce the most stringent approach. SLR respects human rights by having policies and procedures in place to identify, prevent, mitigate and account for how it addresses its adverse human rights' impacts. We are committed to respecting the human rights of vulnerable groups who may face greater human rights challenges, including women, national or ethnic groups, religious and linguistic minorities, children, 2SLGBTQI+ people, persons with disabilities and migrant workers. We also fully support the eradication of all forms of forced or compulsory labour and the abolition of child labour.
- **Fraud Policy** – in Q4 2025, SLR launched a new Fraud Policy and in Q1 2026, specific training on fraud that was mandatory for all employees to attend. Our Fraud Policy maintains a zero-tolerance approach to fraud, including in our supply chain. Our fraud prevention framework supports transparency and ethical business conduct, which are integral to identifying and mitigating modern slavery risks.
- **Whistleblowing Policy** – Encourages all SLR staff to report any concerns related to the direct activities of the organisation or of its supply chain. This includes any circumstances that may give rise to any unethical practices or behaviours, including enhanced risk of slavery or human trafficking. SLR's whistleblowing procedure is designed to make it easy for workers to make disclosures, confidentially and without fear of reprisal. SLR has a whistleblowing hotline, hosted by the independent company, Safecall, to provide a further mechanism for whistleblowing. This hotline is advertised in local languages in the vast majority of SLR's offices across the world.
- **HR Policy and Recruitment** – SLR either recruits individuals directly or uses a list of pre-approved agencies with whom it has a written contract, and who share SLR's professional and ethical approach to recruitment. SLR seeks to verify the practices of each of these agencies before a contract is agreed whether it is of a permanent or temporary nature.
- **Supplier Code of Conduct** – SLR has a separate, standalone code of conduct for Suppliers, which was most recently updated in January 2026. This sets out our expectation that all our suppliers will adhere to the code which embodies the principles set out in the UDHR, the UN Guiding Principles on Business and Human Rights, and the ILO's eight core conventions, the ILO Declaration on Fundamental Principles and Rights at Work. We expect our suppliers to implement, where appropriate, processes and procedures to promote compliance across its supply chain.

- **Supplier Approval Procedures** – SLR segments its supply base on a risk factor basis, taking into account factors such as geography, the nature of the services provided and labour intensity. Thereafter, each segment will have a different vetting process, depending on the risks. Some potential suppliers are required to complete questionnaires before being included on SLR's approved suppliers list. These questionnaires incorporate a requirement for all suppliers to comply with their own or SLR's Supplier Code of Conduct, the *UK Bribery Act 2010*, National Minimum Wage Regulations and the *Modern Slavery Act 2015*. Where appropriate, copies of policies are sought from suppliers so they can be reviewed for compliance with SLR's requirements. In addition, our standard subcontractor engagement contract (used where we subcontract work to a third party under our client contracts) requires suppliers to commit to complying with our Supplier Code of Conduct.
- **Living Wage** – Other than a small number of apprentices, 100% of SLR's UK employees are paid at or above the Living Wage (which is above the government determined minimum wage) which shows a commitment to avoiding labour exploitation within our own business.

All policies and procedures of SLR are regularly assessed at least annually and periodically updated against best practice.

5.0 Due Diligence/Managing Risk

SLR manages its potential ongoing risk through appropriate core business processes including project management and procurement processes which are embedded into our Quality Management System which is externally certified to ISO9001:2015. All procurement must be from approved suppliers and supplier performance is regularly monitored and audited if necessary. SLR does not wish to be associated with any organisation that either has or is found to be involved with either human trafficking or modern slavery. If we were to find evidence that one of our suppliers had failed to comply with the *Modern Slavery Act 2015*, we would require the relevant supplier to remedy such non-compliance and would terminate our relationship should we see no substantial improvement in the way their business was conducted.

6.0 Training

Given our view that SLR's exposure to modern slavery risk continues to be very limited, we consider our existing due diligence and other processes to be sufficient and appropriate to manage this level of risk. However, should circumstances arise which we consider may be particularly high risk, appropriate training will be developed and targeted at relevant staff members. This approach will be reviewed periodically by senior management.

7.0 Board Approval

This statement has been approved by the board of directors of both Solar Holdings Topco Limited and SLR Consulting Limited.



Bradley Andrews
Chief Executive Officer
for and on behalf of Solar Holdings Topco Limited