



## SLAVERY AND HUMAN TRAFFICKING STATEMENT

for Financial Year ended 31 December 2024

This is the slavery and human trafficking statement of H2NE ParentCo Limited (the “**Parent**”) and its wholly owned subsidiary, H2NorthEast Limited (together with the Parent, the “**Group**”), in respect of the financial year ended 31 December 2024.

We note that in respect of the financial year ended 31 December 2024, the Group had a total turnover of less than £36m, which is the threshold prescribed by The Modern Slavery Act 2015 (Transparency In Supply Chains) Regulations 2015 above which a business is required to produce a slavery and human trafficking statement. However, in line with the approach taken by the respective corporate groups of the shareholders of the Group (being Kellas Hydrogen Limited (“**Kellas**”) and SSE Hydrogen Holdings Limited (“**SSE**”), both 50% shareholders) and for transparency, the Group has elected to make a voluntary slavery and human trafficking statement consistent with the requirements of section 54(1) of the Modern Slavery Act 2015 (the “**Act**”).

### INTRODUCTION FROM THE BOARD OF DIRECTORS OF THE PARENT

We are committed to ensuring that we combat slavery and human trafficking throughout the Group, in a manner appropriate in the context of the business of the Group, to ensure the Group’s compliance with the law.

We are committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, suppliers and other business partners. We expect that our suppliers will hold their own suppliers to the same high standards.

### OUR BUSINESS

The Group is the developer of a one GW CCUS-enabled low carbon hydrogen production facility adjacent to the Central Area Transmission System terminal on Teesside, known as H2NorthEast. H2NorthEast will initially deliver 355 MW of low carbon hydrogen to local industry in Teesside before upscaling to deliver more than a gigawatt of hydrogen post 2030, further supporting Teesside and the industrial regions linked by the East Coast Hydrogen network. During the financial year ended 31 December 2024, H2NorthEast was in the front-end engineering and design (“**FEED**”) phase.

Kellas Midstream Limited (the “**Service Provider**”), a company within Kellas’ corporate group, provides management and support services to the Group and is the employing entity of the personnel carrying out the day to day business of the Group. The Group itself does not employ any personnel.

The Group’s management team, consisting of the boards of the Group companies and a project management board in each case with representatives from each of Kellas and SSE, supported by the Service Provider and its personnel, are responsible for the delivery of the business of the Group.

### OUR SUPPLY CHAINS

In connection with certain aspects of the business of the Group, including FEED services and technology solution provision, the Group contracts with third parties to provide these services. Such services are performed by third party organisations possessing the necessary capabilities and expertise to perform such services. These third-party suppliers have been appointed following rigorous tendering and review processes and all have considerable experience of the work they have been appointed to perform. They themselves may rely on the provision of services from third parties.

In addition to the appointment of the above-mentioned third-party suppliers, the Group also relies, for the proper performance of its business, on the provision by third party suppliers of financial, technical, legal and other operational services to augment in-house capabilities and the capabilities of the Service Provider. These service providers are appointed as and when the needs of the business so require.



The Group maintains close relationships with our suppliers and monitors the activities they carry out on our behalf on a continuous basis. The Group assesses the suitability of, and audits, these suppliers on a regular basis against their contractual undertakings.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. The Group adopts the Anti-slavery and Human Trafficking Policy of Kellas' corporate group (our "**Policy**"). Our Policy was updated and reissued within the Group during 2023 and reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our Policy will be reviewed again during 2025 to ensure that it continues to be fit for this purpose. In addition, during 2025, our Service Provider will be implementing a group wide whistleblowing policy and reporting platform, which supports our commitment to ensuring no modern slavery or human trafficking takes place in our supply chains or in any part of our business, by encouraging the Service Provider's personnel to report any suspicions they may have in this regard, with confidence and anonymously, if preferred.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk we, with the support of the Service Provider:

- carry out due diligence in respect of, and audit, our supply chains to identify and assess potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

## **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we provide them with a copy of our Policy and ask them to confirm they have received and understood the requirements of that Policy, they will not act in contravention of that Policy and will comply with all applicable laws.

In order to monitor our supply chains' compliance, the Service Provider undertakes regular performance management meetings with, and audits of, our existing long term supply chain and a detailed tendering process, as required by our business model, prior to engaging our key supply chain. This process is supported by the wider business and we only engage with key suppliers which are well established entities with strong reputations of good management.

## **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, the Service Provider provides training to its staff. Online training is provided to all new staff. The training material is regularly updated and all staff undertake training at least every two years, to cover any new developments and ensure continued familiarisation.

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

Our procurement processes require that a legal advisor be involved in the award of all contracts, and a rigorous review process is carried out as part of any tendering exercise, at which point the sub-contracting strategy of the relevant potential service provider is considered.



## FURTHER STEPS

For the purposes of heightening scrutiny of our supply chains generally, and ensuring that neither slavery nor human trafficking are present therein, we have implemented, and will continue to refine, a formal contractor due diligence procedure for use throughout the Group. This process helps us assess the risks of slavery and human trafficking within our supply chain more consistently, and understand and assess the effectiveness of the steps and action taken by companies within our supply chain to avoid instances of slavery and human trafficking and to ensure we monitor and regularly review those risks and actions.

This statement is made voluntarily and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2024.

DocuSigned by:

*Nathan Morgan*

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Director, for and on behalf of  
**H2NE PARENTCO LIMITED**

Date: 28 June 2025