

Human Rights and Modern Slavery Statement

For the financial year 2025

1. Introduction

This Human Rights and Modern Slavery Statement (hereafter “**Statement**”) outlines MFT Energy A/S and its subsidiaries’ (hereafter “**MFT Energy**”) commitment to preventing slavery and human trafficking in all business activities. This Statement furthermore details the measures taken to ensure that no slavery or human trafficking is present in the operations.

MFT Energy acknowledges the UK Modern Slavery Act 2015 and supports its objective to eradicate forced labour and human trafficking.

MFT Energy strives to be the best possible company for the benefit of its employees as well as its business partners. Additionally, the aim is to contribute to society, and as an integrated part of this ambition, MFT Energy supports and complies with internationally recognised principles for environmental protection, human and labour rights, business ethics and anti-corruption.

2. Who is MFT Energy?

MFT Energy is an independent energy trading firm specializing in power, gas, and environmental products. The company was established in 2016 and conducts trading operations 24/7 across 41 countries worldwide. MFT Energy’s trading expertise restores energy balance and enhances market efficiency. MFT Energy engages in both physical and financial trading, in which the supply chain comprises several suppliers.

3. Incorporating the Statement in the culture

This Statement sets out MFT Energy’s position in line with internationally recognized human rights principles. The Statement is available on the website, and MFT Energy annually reviews and confirms its compliance with the Statement. The Statement is incorporated into the business culture through the Code of Conduct and commitment to ESG (Environment, Social, Governance) principles. MFT Energy has built a culture where employees can feel free to share ethical dilemmas and potential violations if rules, legislation, ethical standards, and internal policies are not complied with. This is facilitated by a robust whistleblower scheme, which encourages transparency and accountability throughout the organization.

4. Ensuring human rights risks

MFT Energy is committed to upholding a healthy and safe working environment that respects fundamental human and labour rights. MFT Energy does not tolerate any form of discrimination, forced or compulsory labour, or child labour. While MFT Energy's operations are not in industries or geographies typically associated with elevated human rights risks, MFT Energy remains vigilant through its business practices. As a part of the risk management framework, Know Your Counterparty (KYC) and sanctions screening are conducted on all counterparties and relevant stakeholders. These processes help identify and mitigate potential risks related to human rights violations in the supply and value chains. MFT Energy ensures that all employees, in all countries in which it operates, are recruited lawfully in accordance with applicable legislation. HR management procedures are implemented to ensure compliance across relevant jurisdictions. In addition, all employees are required to have valid residence to ensure that they are living and working legally in the relevant country.

5. Due diligence and risk assessment

MFT Energy considers its position within the energy trading industry to be associated with a low risk of modern slavery. MFT Energy expects its suppliers and business partners to ensure that modern slavery does not occur within their supply chains. Modern slavery is a global issue that typically occurs within industries where labour is intensive, low-skilled, and underregulated across supply chains. Although MFT Energy's position within the energy trading industry is considered to be low risk, all counterparties are subject to thorough review, and if issues are identified and not resolved to MFT Energy's satisfaction, the business relationship is terminated. Additionally, the Know Your Counterparty (KYC) process ensures that MFT Energy understands its counterparties and stakeholders, thereby helping to mitigate any potential risks related to modern slavery within the supply chain.

6. Setting the tone from the top to ensure compliance

In order for MFT Energy to effectively give effect to this Statement, key employees in the business have an understanding of this topic and the approach to risk identification and management. MFT Energy places strong emphasis on setting the tone from the top, which ensures awareness on an ongoing basis. Having strong competencies within leadership and compliance are essential to ensure an ongoing strengthening of MFT Energy's overall governance. The systematic approach and constant focus on

documentation and compliance ensure a high level of governance.

Accountability for human rights and modern slavery relating to the business resides with the Chief Executive Officer. The Head of Compliance is responsible for the day-to-day management of the Statement.

7. Commitments


MFT Energy monitors and evaluates its processes on an ongoing basis to ensure an effective approach to prevent slavery from occurring in any part of the business. MFT Energy is committed to respecting human rights in all its activities and supports the principles set out in UN's 30 articles regarding Universal Declaration of Human Rights.

8. Approval and reviewing

This Statement covers the financial year 2025. The Statement is reviewed annually by the Executive Management and approved by the Board of Directors. The signing has been delegated to the Chief Executive Officer of MFT Energy.

Bo Palmgren

Chief Executive Officer
26-05-2026

Signed by:

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