Modern Slavery Act Transparency Statement

This is the Modern Slavery Act Transparency Statement of Phoenix group companies for the financial year ending 31 December 2024. It is made pursuant to s.54 (1) of the UK's Modern Slavery Act 2015 and has been adopted by CK William Energy UK Limited, Phoenix Distribution Holdings Limited, Phoenix Energy Group Limited (PEGL) and Phoenix Energy Services Limited (the "Phoenix Group").

The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). The Phoenix Group is committed to combatting all forms of Modern Slavery. This statement sets out the steps taken by the Phoenix Group to understand Modern Slavery risks and to ensure steps are taken to prevent Modern Slavery in our business and in our supply chains.

The International Labour Organisation's (ILOs) indicators of forced labour are:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

The Phoenix Group

The Phoenix Group is the largest gas distribution business in Northern Ireland, being the owner and operator of the licence for the distribution of natural gas in the Greater Belfast area, Larne and East Down. We are responsible for the development of the pipeline network and also for providing a 24/7 operational and transportation service platform to gas suppliers.

Phoenix Energy Services Limited ("PESL") is a specialist provider of downstream services into the Northern Ireland energy market.

Modern Slavery Policy

The Phoenix Group has adopted a Modern Slavery Policy. It 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 Modern Slavery is not taking place anywhere in our business or related supply chains. This Policy has been sent to all existing suppliers and also promoted to employees and other workers.

The scope of our Whistleblowing Policy has been widened to include the reporting of Modern Slavery concerns.

Supplier due diligence

All suppliers wishing to conduct business with PEGL or PESL must complete a supplier due diligence questionnaire. This is part of a supplier approval process that includes a pre-qualification assessment of HSE compliance, company and financial performance and relevant employment related information.

Following the completion of a 'Fair Supply Supplier Risk Review', Phoenix Group have taken the additional steps to engage directly with suppliers deemed to be of the highest risk of modern slavery. Relevant suppliers were provided with information on how the Phoenix Group complies with Modern Slavery legislation and were asked to confirm their compliance and provide copies of relevant supporting documentation (Policies, Transparency Statements etc).

Training

Alongside the promotion of our Modern Slavery Policy, where applicable, training that is proportionate to the level of risk has been provided to relevant staff.

Further steps

The Phoenix Group has engaged an external advisor to provide ongoing recommendations in respect of its response to the Modern Slavery Act.

Modern Slavery risk is to be monitored in a structured manner.

This statement will be reviewed annually by our Business Services department.

Signed for and on behalf of the following companies:

Signed: Date: 18th December 2024

Director of Phoenix Distribution Holdings Limited

Signed: Date: 18th December 2024

Director of Phoenix Energy Group Limited

Signed: Date: 18th December 2024

Director of Phoenix Energy Services Limited

Signed: Date: 22nd January 2025

Director of CK William Energy UK Limited