

Modern Slavery and Human Trafficking Policy

Modern slavery statement

This statement applies to Seras Energy (formerly Esken Renewables Limited) (referred to in this statement as “the Organisation”), made pursuant to section 54 (1) of the Modern Slavery Act 2015, and demonstrates our commitment to tackle modern slavery and sets out our approach to understand whether slavery, servitude, forced labour and/or human trafficking (together Modern Slavery) exists in our supply chain. This statement covers Seras Energy Limited which meets the criteria for publishing an annual modern slavery statement under the Act. This statement refers to the financial year ending 31st December 2025.

Organisational structure

The Organisation is a limited company, wholly owned by Pioneer Balmoral UK Limited, and operated by its Board of Directors.

As at the end of the financial year, the Organisation's headcount was 275, operating nationally with its head office based in Widnes, Cheshire. Regional operational bases include Widnes, Penrith, Rotherham, Pollington, Middlesbrough, Tilbury, Newport and Swansea.

Further details about our business can be found at: - [Homepage - Seras](#)

We operate solely in the United Kingdom, providing renewable fuel to customers and transporting product from suppliers to our processing sites and then on to customers.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Policies and Procedures

The Organisation is committed to acting ethically and ensuring there is no slavery or human trafficking in our supply chain or in any part of our business.

Our internal policies reflect our commitment in all our business relationships to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

All internal policies are reviewed regularly to ensure they are appropriate, well communicated and promote continued compliance with the Act and other applicable legislation.

The following key policies are in place which relate to the prevention of slavery and human trafficking in our operations:

- **Modern Slavery & Human Trafficking Policy.** This policy reaffirms our commitment to tackling slavery and human trafficking and setting out the standards expected of all colleagues.
- **Whistleblowing Policy.** The Organisation encourages all colleagues to report any concerns related to the activities of the business, including in relation to modern slavery and human trafficking. The Organisation's whistleblowing policy and procedure is designed to ensure that any matter reported will be investigated thoroughly, promptly and confidentially.
- **Supplier Code of Conduct.** This code sets the standards by which the Organisation judges its suppliers and requires them to adhere to.

We continually review our policies and processes to ensure they achieve the right results; this includes but is not limited to focusing on ethical standards, to ensure that they are embedded into our organisation and direct value chains.

Commitment – What We Do

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to continue to comply with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not knowingly do business with any other organisation, in the United Kingdom or abroad, which supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

Supply chain adherence

The Organisation takes a zero-tolerance approach to modern slavery and human trafficking and reserves its rights to terminate any arrangements with any of its suppliers should any modern slavery or human trafficking offence be committed or suspected.

The Organisation will monitor its policies and procedures as required to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or own business.

Internal Audit and Assurance

Environmental, Social and Governance (ESG) standards is a risk area on our Organisational Risk Register. Modern slavery risk falls within this risk area. This helps to ensure that from a strategic point of view, ESG risks are regularly monitored and are key factors used to inform our annual internal audit plan and assurance work.

Risk Assessment and Management

The organisation considers its supply chain to be at a 'low risk' in relation to slavery and human trafficking and has seen no reported incidents of slavery or human trafficking. Additionally, whilst we have not yet seen reason to consider our previous formal assessment of risk in this area, we will keep this under review during the current finance year to determine if there is any need to change this position.

Training on Modern Slavery and Human Trafficking

It is our intention to have all our colleagues retrained by the end of the current financial year, by way of e-learning, about the risks and possible indicators of modern slavery and human trafficking. For our new starters, this training will be mandatory and will have to be completed within the first month after their start date. Thereafter this training will be repeated bi-annually. Compliance is monitored via the People Team.

Effectiveness in Combating Modern Slavery and Human Trafficking

The Organisation has not seen any instances of slavery or human trafficking in its supply chain or its own operations to date (nor has it received any allegations of Slavery or Human Trafficking). Any suspected incidence of slavery or human trafficking within the Organisation or its supply chain would be immediately reported to the Board of Directors and the General Counsel in the first instance. It would then be dealt with appropriately, which may include, but is not limited to, terminating commercial relationships, disciplinary action and/or notifying the relevant authorities.

The Organisation carries out risk-based due diligence processes in relation to ensure that slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers. The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewed our supplier contracts to include termination powers where appropriate if the supplier is, or is suspected, to be involved in modern slavery
- taken action to reinforce its zero-tolerance policy towards modern slavery

Raising Concerns

The Organisation has an independent external whistleblowing hotline available for colleagues to raise any concerns regarding modern slavery and/or any other qualifying disclosures. The Head of People and Head of Risk & Compliance will then undertake relevant action regarding the Organisation's obligations.

What We Have Done In 2025

In 2025, the organisation took the following actions:

- Continued to raise awareness amongst employees of modern slavery and human trafficking issues through our training programme.
- Reviewed our key supplier contracts to include termination powers if the supplier is, or is suspected, to be involved in modern slavery
- Taken action to embed a zero-tolerance policy towards modern slavery

What we will do in 2026

As part of our ongoing commitment to ensuring modern slavery and human trafficking is not present within the organisation or its activities we will continue to take and embed the following actions in 2026.

- As we engage with more long-term partners, work collaboratively to ensure a consistent best practice model is adopted for tackling these issues and ensuring and maintaining compliance.

- Continue to raise awareness amongst our colleagues of modern slavery and human trafficking through our training programmes, including the implementation of a new training programme covering slavery and human trafficking.
- Continue to implement our Code of Conduct for our suppliers which reflects our organisational values, in line with the businesses brand and values.
- Continue to refresh training for all our colleagues about the risks and possible indicators of modern slavery and human trafficking.

Measuring Our Effectiveness

We recognise that modern slavery and human trafficking is a global and increasing challenge for businesses and we are committed to an ongoing action plan to develop our approach and monitor its effectiveness. To do this we will continue to:

- Review the effectiveness of our Modern Slavery and Trafficking Policy and the Supplier Code of Conduct.
- Ensure all colleagues review our policy bi-annually and confirm they have read and understood it.
- Ensure our supply chain remains under constant review; and
- Continue to monitor any cases reported via our Whistleblowing Policy.

Overall, we will continue to focus on understanding further our supply chains, identifying risk areas and increasing awareness amongst employees on the issues of modern slavery and human trafficking and the reporting procedures available to them. We will continue to update policies and procedures as required to ensure appropriate safeguards against any mistreatment of persons are in place.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year. The statement was prepared by the Head of People and approved by the Board of Directors of Seras Energy Limited.

Date of approval: April 2026



Richard Jenkins
CEO
Date: April 2026