

Modern Slavery Act 2015 (MSA)

Octopus Group Holdings Ltd is a private limited company, incorporated in England and Wales with registered number 14002583. The Registered Office is at 6th Floor, 33 Holborn, London EC1N 2HT (Octopus, We or Us). Octopus Investments Limited, a subsidiary company (also incorporated in England and Wales with registered number 3942880), is regulated by the Financial Conduct Authority.

Services and supply

The services Octopus utilises itself are office based and its supply chain in relation to services consists, on the whole, of other regulated professional services (Chartered Surveyors, Law Firms, Accountancy Firms and Banks). Octopus considers these to be very low risk in relation to slavery and human trafficking so takes no specific action in respect to these relationships.

Octopus provides a range of services within the structure of investment and fund management. Investment is made directly into energy generation and supply, healthcare, schools and renewable energy. Octopus Investments invests, on behalf of its customers, in a range of different businesses and industries through its Ventures team which invests in a range of tech-enabled businesses. Through its Capital Team, it invests in real estate, sustainable infrastructure, fibre businesses, an operating landfill gas and biomass business, a retirement village operator and housebuilder, as well as having a private debt offering. The Smaller Companies Team invest in AIM-listed companies.

Octopus requires all portfolio companies to complete its engagement tool as part of the pre-completion process at the point of investment. This captures how companies consider their key stakeholders (employees, community, customers, and the environment) and their governance practices. One of the questions within the tool assesses whether companies pay the Living Wage to employees and interns and ensures that formal employment contracts are in place. Where companies fall short, Octopus engages with them to encourage improvement. Following investment, Octopus then requests updated information on an annual basis through the same engagement tool for some of its products so that it can track progress.

The majority of other services supplied to or on behalf of Octopus are from the construction industry and other services associated with property (domestic, commercial, rural and forestry). Given what Octopus understands to be a low risk profile of anyone supplying us with services being involved in slavery and/or human trafficking, we believe our current procedures, as described below, and ability to rely on regulatory oversight in relation to professional services are sufficient in this regard.

Key suppliers that Octopus engages with are required to complete enhanced due diligence via a third-party platform used to collect and manage their due

diligence responses. Octopus applies a supplier tiering framework, under which suppliers are categorised based on factors such as risk, criticality, and the nature of the services provided. The level and depth of due diligence conducted are proportionate to the relevant supplier tier.

Suppliers are required to create a profile on the platform and complete a structured questionnaire inclusive of social, environmental, and governance (ESG) factors. This includes questions relating to any recorded incidents of Modern Slavery in the past 12 months, compliance with applicable Human Rights laws and regulations, ethical labour practices, and measures in place to prevent modern slavery. Where a supplier responds in a negative manner to any of these questions, they must provide supporting evidence and complete additional follow-up questions.

Goods

In terms of goods supplied to Octopus, the majority of goods will be goods for use in an office environment. Given what Octopus understands to be a low risk profile of suppliers of goods, no specific training is provided or undertaken by Octopus staff in relation to these matters.

Training of staff

Octopus provides employees and management with training on a range of compliance matters which, where relevant to their role, would include their obligations under the Modern Slavery Act 2015, particularly in relation to mitigating risks within supply chains.

This statement is made pursuant to the Modern Slavery Act 2015 and constitutes the Octopus Group slavery and human trafficking statement.

This statement was approved by the Board of Directors of Octopus Group Holdings Ltd on 19 May 2026.

Simon Rogerson
CEO
19 May 2026