



Industrial Turbine Company (UK) Limited

Modern Slavery Act Statement

Financial Year Ended 30 September 2025

1. Introduction

This statement is made under section 54 of the **Modern Slavery Act 2015** and sets out the actions taken by **Industrial Turbine Company (UK) Limited (ITCL)** during the financial year ending 30 September 2025 to prevent modern slavery and human trafficking across our operations and supply chain.

ITCL operates within Siemens Energy Group's global governance framework, which embeds ethical conduct, sustainability, and human-rights protection across all business activities. Sustainability is central to Siemens Energy's purpose, "**We energize society,**" and is reflected in our commitment to resilience, responsible growth, and the energy transition. Our global sustainability programme aligns with the UN Sustainable Development Goals (SDGs), with a particular focus on SDGs 5, 7, 8, 9 and 13.

These values — **caring, respectful, and accountable** — guide our approach to eliminating modern slavery and upholding the highest standards of integrity.

2. Our Commitment

ITCL maintains a **zero-tolerance approach** to all forms of modern slavery and human rights abuses. We act with integrity, transparency, and accountability in all interactions, supported by structured governance systems designed to prevent exploitation.

Siemens Energy's sustainability strategy emphasises **resilience, decarbonisation, responsible supply chains, and strong ethical governance**, underpinned by internationally recognised labour standards and the principles of the UN Global Compact. We recognise our responsibility to contribute to a just, sustainable society and embed this philosophy throughout our operations.



3. Our Business and Supply Chain

3.1 Our Organisation

ITCL operates across the United Kingdom, delivering engineering, energy technology, maintenance, and digital transformation services to customers in critical infrastructure sectors. ITCL forms part of Siemens Energy's global workforce of approximately **100,000 employees**, enabling the transition to a more sustainable and secure energy system.

3.2 Our Global Supply Chain

Siemens Energy's supply chain is globally distributed and essential to delivering reliable and sustainable energy solutions. Our supply-chain sustainability approach focuses on:

- sustainable procurement;
- capability-building for suppliers; and
- managing environmental, social, and compliance risks across multi-tier supply networks.

We apply a holistic **prevent–detect–mitigate–remediate** framework, ensuring that suppliers are supported and held accountable through clear expectations, training, and structured monitoring. This includes:

- global procurement standards outlining minimum requirements for all suppliers;
- a Supplier Code of Conduct aligned with UN and ILO frameworks;
- mandatory sustainability assessments for onboarding;
- responsible minerals sourcing practices; and
- carbon-reduction programmes contributing to Siemens Energy's net-zero ambition.

These measures strengthen ITCL's ability to manage risks associated with modern slavery and promote responsible practices throughout our supply chain.

4. Supplier Due Diligence & Controls

4.1 Onboarding & Screening

All suppliers must commit to our Supplier Code of Conduct, which prohibits forced labour, human trafficking, child labour, and any form of exploitation.



ITCL implements risk-based due diligence at onboarding, including:

- country-specific human-rights risk analysis;
- sector-based risk screening; and
- compliance integrity checks.

Suppliers operating in higher-risk environments must complete a Corporate Responsibility Self-Assessment (CRSA), aligned with Siemens Energy's global sustainability standards.

4.2 Ongoing Monitoring

We continue to monitor supplier performance through:

- external sustainability audits;
- periodic self-assessments;
- corrective action programmes; and
- escalation processes for severe or unresolved breaches.

External Sustainability Audits help confirm adherence to the Code of Conduct for Suppliers and Third-Party Intermediaries, ensuring compliance with international standards.

4.3 Supplier Capability Building

We actively support suppliers through training, guidance materials, and capability-building programmes to strengthen sustainability, human-rights protections, and ethical practice across the supply chain.

5. Speak Up & Whistleblowing

5.1 Speak Up Tool

The "Speak Up" hotline for reporting compliance violations in a secure manner, 24 hours a day, 7 days a week, in thirteen languages, is available to employees, customers, suppliers and other stakeholders online or via telephone. Reports can be made anonymously. The "Speak Up" system is managed by a third-party supplier. In addition, the external and independent Siemens Energy Ombudsperson is available for the reporting of compliance violations.

Link to Speak Up hotline: [Siemens Energy Reporting Channels](#)

5.2 Non-Retaliation

ITCL strictly prohibits retaliation against any individual reporting concerns in good faith and ensures appropriate protection mechanisms are in place.

6. Policies, Training & Governance

6.1 Policies

ITCL adheres to Siemens Energy's globally binding policies, which include:

- Human Rights Policy
- Code of Conduct for Sustainability
- Business Conduct Guidelines
- Supplier Code of Conduct

Together, these policies set clear expectations for ethical conduct, compliance, and accountability.

6.2 Training

All employees complete mandatory training on human rights, ethical behaviour, and reporting obligations. Procurement and supply-chain professionals receive enhanced training on:

- identifying forced-labour and trafficking indicators;
 - conducting effective due diligence; and
 - maintaining robust supply-chain sustainability practices.
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7. Risk Assessment & Management

7.1 Identifying Risks

ITCL leverages Siemens Energy's global risk-assessment tools to identify and manage potential modern-slavery risks, drawing on:

- CRSA outcomes;
- sustainability audit findings;
- country- and sector-level risk mapping;
- external sustainability insights.

7.2 Key Risk Areas

ITCL's risk landscape includes:

- subcontracted labour in higher-risk jurisdictions;
- sourcing of low-cost components from regions with known forced-labour prevalence;
- the inherent opacity of multi-tier supply chains; and
- environmental challenges that may exacerbate labour vulnerabilities.

7.3 Mitigation

Mitigation measures include:

- strengthened due-diligence protocols;
 - supplier engagement and capability-building;
 - responsible minerals sourcing aligned with global standards; and
 - procurement strategies that reinforce decarbonisation and supply-chain resilience.
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8. Effectiveness & KPIs

ITCL monitors effectiveness using:

- CRSA completion rates for high-risk suppliers;
- audit findings and remediation progress;
- Speak Up trends and outcomes; and
- broader Siemens Energy sustainability KPIs, covering decarbonisation, ethical governance, and resource efficiency.

Future developments will include:

- enhanced training metrics;
 - deeper supply-chain transparency; and
 - expanded tracking of supplier sustainability performance.
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9. Collaboration & Continuous Improvement

Partnership and collaboration underpin Siemens Energy's sustainability strategy. ITCL works with customers, suppliers, industry associations, civil-society partners, and global sustainability networks to improve systems and processes.



We actively support the objectives of the Paris Climate Agreement and engage in cross-industry dialogue to promote ethical, sustainable supply chains.

10. Publication Requirements

In accordance with **section 54 of the Modern Slavery Act 2015**, this statement:

- is approved by the **ITCL Board**;
 - is **signed by two Directors**; and
 - is **published on ITCL's website**, [Siemens Energy](#)
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Signed:

Darren Davidson

Director, Industrial Turbine Company (UK) Limited

Signature: *Darren Davidson* Electronically signed by:
Darren Davidson
Date: Mar 20, 2026
16:23:42 GMT

Date: Mar 20, 2026

Ross Dean

Director, Industrial Turbine Company (UK) Limited

Signature: *RDean* Electronically signed by:
Ross Dean
Date: Mar 23, 2026
09:01:45 GMT

Date: Mar 23, 2026