

kent

Modern Slavery Statement

Kent is committed to combating modern slavery in all its forms. We are dedicated to upholding the highest ethical standards and promoting the well-being and dignity of all individuals involved in our operations. This statement sets out our approach to ensuring that slavery and human trafficking are not taking place in any part of our business or supply chains.

Scope

This statement is made on behalf of Kent Corporate Holdings Limited and its subsidiaries, including but not limited to Kent Energies UK Ltd, Kent Projects PTY Ltd and Kent Canada Limited. This statement is made pursuant to our obligations under the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 and the Canadian Modern Slavery Act. This Statement covers the financial year 2023. Kent is committed to treating its employees and business partners with respect and dignity. Kent does not tolerate any form of modern slavery. For purposes of this Statement, modern slavery includes any form of forced labour, child labour and human trafficking.

Responsibilities

All Kent employees are responsible for following the commitments set out in our policies and processes related to human rights.

Organisational Structure and Supply Chains

At Kent we design, build and maintain the assets that power the world for today and make it future-ready for tomorrow. From consulting to design, build, commissioning and start-up, through to maintenance and decommissioning. At Kent, it is our ambition to be the global leader in integrated energy services through our 10,500 wonderfully different and talented people across 36 countries.

In the UK, Kent Energies UK Ltd represents an engineering projects and consultancy business with a growing team of around 500 people working across all energy markets.

In Australia, Kent Projects PTY Ltd is supported by a team of over 600 people providing engineering, projects, commissioning and operations & maintenance across all aspects of the energy sector.

In Canada, Kent Canada Technical Ltd. is supported by a team of 900 people providing engineering, procurement, and construction services across various industry sectors.

Third parties looking to partner with Kent are subject to a comprehensive evaluation via our due diligence platform. This process includes examining each party's stance on modern slavery and evaluating any negative claims made against them.

We employ and empower the best and let them make decisions to deliver on our purpose, “Courageously tackling the greatest challenge of our time, to bring our world the energy it needs in the most responsible way ever imagined”.

Our beliefs define and drive us every day to be the very best – for ourselves, our clients, our key stakeholders, the communities we operate in and the planet:

We **PLAY BIG**

We are **FANATICAL ABOUT PERFORMANCE**

We thrive on **EMOTIONAL AGILITY**

We are built on **INFINITE THINKING**

For more information on our purpose and beliefs, please visit our **website.**



We recognise that modern slavery can occur at any level of the supply chain, both within the United Kingdom and internationally. Our supply chains are complex, involving numerous suppliers, contractors, and business partners worldwide.

As a member of the UN Global Compact, Kent supports the Ten Principles of the UN Global Compact on human rights, labour, environment and anti-corruption. We have chosen to voluntarily go further than the Universal Declaration of Human Rights (UDHR), and commit to uphold the Global Compact Principles, including principles 1, 2 and 5 which address human rights specifically:

1. Businesses should support and respect the protection of internationally proclaimed human rights; and

2. Businesses should make sure that they are not complicit in human rights abuses; and

5. Abolish child labour.

Abuse of human rights will not be tolerated under any circumstances. We continue to seek for ways not only to make sure that we address this directly within our sphere of influence, but also to work with our peers and industry bodies to improve standards.

Policies and Commitments

We have implemented robust policies and procedures to prevent and address modern slavery within our organisation. These policies include:

1. Employee Code of Conduct: We have developed an employee code of conduct that outlines our commitment and our expectations with regards to combating slavery and human trafficking. This code is applicable to Kent Directors, Officers, and Employees, our subsidiaries and related companies, JV partners, consultants, agents, contractors and their employees. Any breach of the code may result in disciplinary, remedial action or other penalties, including in extreme circumstances, dismissal or termination of the contract of engagement. Kent will act objectively and reserves the right to inform the appropriate authorities where it is considered that there has been any criminal activity or apparent breach of the law.

2. Supplier Code of Conduct: We maintain a Supplier Code of Conduct that requires our suppliers and business partners to adhere to high ethical standards, including compliance with all applicable laws related to slavery and human trafficking. At Kent, we are committed to conducting our business in the most responsible way ever imagined and we expect all our supply partners to adhere to similar standards and values as a precondition of doing business with us.

3. Due Diligence: We conduct due diligence via an independent third-party provider to assess our labour suppliers to identify and mitigate the risk of modern slavery. This includes evaluating their policies, practices and transparency regarding slavery and human trafficking.

4. Employee Awareness and Training: We provide regular training and awareness programs to our employees, ensuring they understand the signs of modern slavery and their responsibilities in reporting any concerns.

Risk Assessment and Monitoring

Our sustainability risks and opportunities register recognises modern slavery and human rights abuses as a potential risk to Kent through our relationships with external third parties. Our sustainability strategy, Sustainability. By Kent, includes a specific focus area centring on how, as an organisation, we can lead by example in this area. Focusing on holding ourselves and everyone we work with to the highest standards as we know that fair, transparent and ethical leadership is critical to our success and that of our stakeholders. We have commitment to the following developments as part of Sustainability. By Kent:

- Develop a multi-step ethics and ABC approach,
- Develop a campaign for those who engage with third parties that compliance cannot be outsourced,
- Undertake due-diligence screening on all suppliers,
- Empower our people to be upstanders, not bystanders, and raise their hand when they see something wrong,
- Review, re-launch and embed, Kent human rights standards for labour suppliers.

Progress towards these commitments is monitored on a quarterly basis and is disclosed both internally and externally.

For more information on Sustainability.by Kent, please visit our website.



Policies and Commitments

We encourage the reporting of any suspicions, concerns, or violations related to modern slavery. Our employees, suppliers, and other stakeholders are encouraged to report such issues through our confidential reporting mechanisms. We will promptly investigate and take appropriate action in response to any reported incidents.

We seek to collaborate with industry associations, governmental bodies, and non-governmental organizations to improve our understanding of modern slavery and to collectively address this issue. We support initiatives aimed at eradicating modern slavery and engage in partnerships to promote responsible and ethical practices throughout our supply chains.



Future Commitments

Kent is committed to continuously improving its practices and procedures to combat modern slavery. We will regularly review and update our policies to ensure their effectiveness in preventing modern slavery. We will also promote transparency by publishing this statement on our company website and communicating it to our stakeholders.





Conclusion

Kent is committed to acting responsibly, ethically, and with integrity in all aspects of our business operations. We will not tolerate any form of modern slavery and will take decisive action to address any such issues that may arise within our organisation or supply chains. This Modern Slavery Statement reflects our dedication to combatting modern slavery and our ongoing commitment to human rights and social responsibility.

John Gilley
Chief Executive Officer


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