



Modern Slavery Statement

Kent is committed to combating modern slavery and human trafficking in all forms, including forced and child labour. 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.

kentplc.com

the energy within



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 2025. Kent is committed to treating its employees and business partners with respect and dignity. Kent does not tolerate any form of modern slavery. For the purposes of this statement, modern slavery includes any form of forced labour, child labour and human trafficking.

Responsibilities

The Kent Board maintains oversight of modern slavery risks through periodic reporting. Operational responsibility sits with the Sustainability, Compliance and Supply Chain functions who collaborate to implement due diligence and remediation activities.

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

Kent is a leading global integrated engineering and project delivery company, bringing decades of experience and innovative solutions across conventional energy, low-carbon and renewable sectors. We work across the full asset lifecycle, from early advisory and engineering through project delivery, construction management, commissioning, asset performance and optimisation, to late-life asset management and decommissioning. Powered by our 13,000 wonderfully different and talented people across 31 countries, we're bringing the world the energy it needs in the most responsible way ever imagined.

In the UK, Kent Energies UK Ltd represents an engineering projects and consultancy business with a growing team of around 650 people working across all energy markets.

In Australia, Kent Projects PTY Ltd is supported by a team of over 800 people providing engineering, projects, commissioning and operations and 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 thrive on
EMOTIONAL AGILITY**



**We are FANATICAL
ABOUT PERFORMANCE**



**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. 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
3. 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 Procedures



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

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 where warranted, dismissal or contract termination. 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 human rights abuse, including modern slavery, and their responsibilities in reporting any concerns.

Risk Assessment and Monitoring

Modern slavery risks present a significant legal, ethical and operational risk to Kent. We have a responsibility towards those we employ to ensure their needs are met and that they are treated with the utmost dignity and respect at all times.

Our operations are heavily dependent on migrant trade workers, making up a significant proportion of our workforce. We recognise our exposure to human rights and modern slavery risks as a result, be that through how these workers are employed, how they get to our projects and how they are treated while they are working for us and / or our partners.

We are reliant on supply chain partners, procuring goods and services from over 64 countries. From Australia to Colombia, from the UK to Canada, our procurement teams are charged with quality, cost-effective and timely purchasing that also meet our strict ethical requirements in line with our beliefs and guiding principles.

We are confident that the risk of modern slavery is low, and there has been no evidence found of modern slavery, across our organisation or supply chain, however we remain vigilant.



BUSINESS &
HUMAN RIGHTS
ACCELERATOR



In 2025, we took part in the United Nations Global Compact Business & Human Rights Accelerator programme. A six-month programme designed and delivered in collaboration with leading human rights experts Shift, the Business & Human Rights Accelerator aims to guide companies from commitment to action on human rights and labour rights, taking part in the programme helped us identify our most salient human rights issue, which we believe to be labour suppliers.

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

Commitments

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 committed to the following developments as part of Sustainability. By Kent:

TARGETS

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

PROGRESS UPDATE

We appointed a new partner who is able to provide customised content. Specific training has been developed for both office-based and craft workers.

A campaign was rolled out across the business, consisting of communications on our intranet and posters displayed at all work locations.

In 2026, we will develop a campaign in collaboration with our legal and supply chain functions.

In 2025, a cross-functional team took part in the United Nations Global Compact Human Rights Accelerator Programme, which aided us in identifying our most salient human rights risk, modern slavery. In light of this, we plan to hold a modern slavery vulnerability workshop in 2026, with the aim of identifying gaps and enhancements in our current processes and creating an action plan to drive improvements.

Due diligence is undertaken on all our supply chain. In 2026, we'll enhance this process further by creating formalised criteria for each level of due diligence.

● Achieved ● On Track ● Behind

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 will ensure workers' legal status. Workers are legally authorised to work for us, our partners, and possess the necessary visas, work permits, and other required legal documentation requirements.

We will protect young people. Workers below 16 or the legal minimum working age (whichever is higher) are not hired, either directly or indirectly.

We seek to collaborate with industry associations, governmental bodies, and non-governmental organisations 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.

Conclusions



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 combating modern slavery and our ongoing commitment to human rights and social responsibility.

John Gilley
Chief Executive Officer

