



Modern Slavery Statement

VPI Group

Date: 26 June 2026

VPI – Modern slavery statement for financial year ending 31 December 2025

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that the VPI Group ('VPI') has taken and continues to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking, child labour and forced labour. VPI has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. Monitoring and supplier engagement activities are in place to detect and prevent potential issues. To date, we have had no reports of modern slavery within our Group or our supply chains.

Our business

VPI is a leading international power company. Backed by Vitol, we play a vital role in the energy transformation, helping to bridge the gap between the now and the next. Our combination of trading and operational mindsets uniquely positions us to anticipate and solve challenges as the transformation unfolds.

We help our customers tackle their energy needs - whether that's working with governments to strengthen energy security, partnering with grid operators to enhance stability, or enabling investors to expand into new power solutions. We do this by developing, building, operating and optimising power assets that deliver reliable, flexible and low-carbon energy to millions of homes and businesses across our markets. Today, this includes UK, Ireland, Germany and Poland.

Our growing portfolio has more than 4 GW of operating assets, including two projects under construction, and we are the largest operator of battery storage in Ireland. Our development pipeline includes more than 1 GW of battery storage in Germany and 770MW in Poland and we are pioneering one of the world's largest carbon capture retrofit projects for power generation in the UK.

Our policies

We operate to ensure that we are conducting business in an ethical and transparent manner and have implemented policies throughout our group to ensure consistency in our approach, including:

1. Recruitment policy. We operate a robust recruitment policy, including (as applicable) conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Procurement policy. We operate a procurement policy that requires understanding of the primary sources of supply and encourages an in-depth knowledge of the supply chain and associated risks.
4. Business Ethics Guide. We have a Business Ethics Guide which sets out the standards of conduct expected of all staff within the VPI Group and helps guide us in conducting business with integrity.
5. ESG Strategy. We have implemented an ESG strategy which aims to enable the sustainable growth of our business activities with a focus on three strategic priorities.

Relevant policies are passed on to our suppliers through a pre-qualification process and our standard terms and conditions.

Our suppliers

VPI operates a Pre-Qualification System and maintains a supplier list through our work management software system. We conduct due diligence through the Pre-Qualification System on all suppliers before allowing them to be included in the supplier list. This due diligence includes a search to ensure that a particular organisation has never been convicted of any criminal offences. Our anti-slavery statement forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this statement. VPI has access to a research service for supplier assurance.

In addition to the above, as part of our contracts with suppliers, we require that they confirm to us that:

- 1. They have taken steps to eradicate modern slavery within their business.
- 2. They hold their own suppliers to account over modern slavery.
- 3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
- 4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
- 5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. We undertake the Chartered Institute of Purchasing and Supply (CIPS) module for Ethics and Sustainability annually and work towards MCIPS where appropriate. When MCIPS is achieved we undergo 30 hours of continued professional development to maintain Chartered status in line with best practice.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified
- We have not had to reject or stop utilising any of our suppliers due to modern slavery practices being identified within their organisations

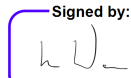
In the next 12 months, we will continue to implement the policies and procedures set out in this statement, taking into account best practice guidance.

Approval for this statement

This statement has been approved by the Boards of Directors of:

VPI Holding Limited;
VPI Power Limited;
VPI Immingham Energy Park A Limited;
VPI Immingham B Limited;
Immingham Energy Limited;
VPI ICHP Limited;
VPI Immingham Operations Limited;
VPI Generation Limited;
VPI UK Operations Limited;
VPI Flex Holdings Limited;
VPI Flex Limited; and
VPI Pipeline Company Limited;

and by the Representatives of the Members of VPI Immingham LLP.

Signed by:

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Lee Warren

Director
VPI Holding Limited
Date: 26 June 2026