



TRITON POWER

MODERN SLAVERY STATEMENT

Triton Power Group's UK Modern Slavery Statement for the Financial Year 2024.

We are committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and enforcing effective systems and controls to combat modern slavery and human trafficking in our own business and in any of our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners and we expect that our suppliers will hold their own suppliers to the same high standards.

Modern slavery is a grave violation of human rights, encompassing slavery, servitude, human trafficking, forced labour, child labour and other slave-like practices. Modern slavery is a global issue that typically occurs in industries that are labour intensive, low skilled and often underregulated. Supply chains can be large, complex and multi-tiered, including our own.

Organisation's structure and our business

Triton Power Limited is a power generator with an overall capacity of 1.35GW, jointly owned by SSE plc and Equinor ASA. We provide power to the UK wholesale electricity market, stability services to the National Grid electricity system operator and power and process steam to local customers through our UK power stations. This statement applies to the Triton Group of companies. The Triton Group includes: Triton Power Holdings Limited, Triton Power Intermediate Holdings Limited, Triton Power Limited, SCCL Holdings Limited, Saltend Operations Company Limited, Deeside Power Operations Limited, Saltend Cogeneration Company Limited, Indian Queens Power Limited and Deeside Power (UK) Limited. All group companies are private limited companies registered in England and Wales or Jersey (the "**Triton Group**").

- Saltend Cogeneration Company Limited owns and operates Saltend Power Station which is a combined cycle gas turbine (combined heat and power) power station located on the Humber Estuary in East Yorkshire. The station has an output capacity of 1200 MW providing power to the UK electricity market, and power and steam to the adjacent chemicals park.
- Indian Queens Power Limited owns and operates Indian Queens Power Station which is an open cycle gas turbine power station located near St Dennis, Cornwall which predominantly provides synchronous compensation services to the National Grid. The station also has the capability to provide up to 140MW of electrical power during peak periods or when the UK electricity market is in distress.
- Deeside Power (UK) Limited owns and operates Deeside Power Station which is a former 500MW gas-fired power station which ceased generation in 2018, the station now provides synchronous compensation services to the National Grid.

In 2024 the Group had a global annual turnover of £402million.

Responsibility and Oversight

Our board of directors has overall responsibility for the effective operation of our policies and this statement relating to modern slavery and human trafficking.

All persons working for us or on our behalf in any capacity, including directors, employees, agency workers, agents, contractors, external consultants, third-party representatives and business partners are responsible for identifying and notifying the business of any concerns or suspicions of modern slavery or human trafficking anywhere in our business or supply chain.

The Management Committee of the Triton Group which consists of directors of Triton Power Limited and members of senior management have responsibility for investigating, assessing and responding to modern slavery and human trafficking incidents, concerns and suspicions raised to the business.

The Board has responsibility for reviewing this statement annually (and periodically as required) from a legal and operational perspective.

This statement applies to all persons working for us or on our behalf in any capacity, including directors, employees, agency workers, agents, contractors, external consultants, third-party representatives and business partners.

Our supply chains

Our supply chain includes; owners, regulators, professional associations, insurers, partners, customers; and suppliers.

In terms of our suppliers, this includes providers of goods and services for the operation and maintenance of our UK power assets and also capital investment projects.

We have mapped the locations of our first-tier suppliers and have identified that a significant proportion (over 90%) are entities located in the UK. Of the small number of international first-tier suppliers, we have identified that no entities are located in countries with a higher prevalence of modern slavery¹.

We ensure that any new suppliers agree to our ethical policies and also provide their own Modern Slavery Statement/policies prior to engaging their services.

Our policies on slavery and human trafficking

We have appropriate policies in place within our business that underpin our commitment to ensure that there is no modern slavery or human trafficking in our business or within our supply chains. We continuously review and update all of our policies.

The following policies are relevant to considerations in relation to modern slavery and human trafficking:

- Triton Power (Triton) Policy Statements: this document includes a statement concerning General Human Rights and Modern Slavery. The Triton Power (Triton) Policy Statements document:
 - is published on our corporate website <https://www.tritonpower.co.uk/> ;
 - notes our continued zero tolerance approach to human rights abuses and modern slavery in all its forms; and
 - confirms our ongoing commitment to uphold: (i) the UN Guiding Principles on Business and Human Rights; (ii) the 10 Principles underpinning the UN Global Compact; (iii) the International Bill of Human Rights; and (iv) the obligations and commitments designed to uphold fundamental rights as set out by the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

¹ Considered against the Walk Free, Global Slavery Index (<https://www.walkfree.org/global-slavery-index/>)

- **Procurement procedure:** This internal governance policy includes our procedures for procurement processes and includes our standard terms and conditions for the purchase of goods and services. We are committed to using reputable suppliers who act ethically and in accordance with Modern Slavery legislation.
- **Anti-corruption and bribery policy:** The policy sets our clear guidance in respect of prevention of bribery and corruption by providing information and guidance to our workers and those working for us on how to recognise and deal with bribery and corruption issues.
- **Whistleblowing policy:** The policy encourages workers to report any concerns about wrongdoing or dangers through the proper channels.
- **Anti-slavery and human trafficking policy:** This policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.
- **Equal Opportunities policy:** This policy sets out our approach to diversity, equity and inclusion and equal opportunities and the avoidance of discrimination within our workplace. This policy outlines out commitment to creating a workplace culture in which diversity and inclusion is valued and everyone is treated with dignity and respect. This policy makes clear our position on freedoms of workers and individuals in our business and includes prohibition of harassment, violence, intimidation or the threat of violence being used against any person.
- **Staff Handbook(s):** Our staff handbooks set out important information relating to the employment of persons with each member of the Triton Group. The staff handbook(s) set out key policies and guidelines which are relevant to considerations of modern slavery and human trafficking including (but not limited to; grievance policy, disciplinary policy, overtime, working hours, shift working, notice and rest days).
- **Large capital projects policy:** this has been further developed and implemented this year and includes modern slavery key considerations as part of its sustainability criteria and action planning.

Due diligence processes for slavery and human trafficking

We are committed to improving our practices and to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We carry out the following due diligence activities in relation to assessment of modern slavery and human trafficking:

Supplier adherence to our values and ethics (assessing and managing risk)

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- our procurement pre-qualification processes and procedures include a series of due diligence questions requiring potential suppliers to confirm:
 - (i) they will comply with our ethical policies (such policies formulated in compliance with the Modern Slavery Act 2015) and/or that they otherwise have equivalent policies in place to prevent or otherwise mitigate the risk of modern slavery;
 - (ii) that they are members of or otherwise adhere to the principles of the UK Living Wage Foundation, aimed at ensuring the workforce is appropriately compensated for the work they undertake; and
 - (iii) whether or not they engage any of their workforce on zero hours contracts and/or have any casual workers within their organisation, again aimed at ensuring the workforce is appropriately compensated for the work they undertake;
- our services agreements with suppliers includes specific clauses around complying with our ethical policies (such policies formulated in compliance with the Modern Slavery Act 2015) and with anti-bribery & corruption laws and obligations (including those aimed at preventing modern slavery);
- our suppliers warrant that they have not been convicted of any offence regarding slavery and human trafficking. They are also required to warrant that they will conduct their business in a manner that is consistent with applicable laws and our ethical policies (incorporating the Modern Slavery Act 2015);
- we require our suppliers to implement due diligence for their own suppliers and subcontractors to ensure there is no slavery or human trafficking in their supply chains; and
- suppliers are required to notify us of any breach or potential breach of our ethical policies (incorporating the Modern Slavery Act 2015).

In terms of how we identify and assess modern slavery risks and the sources we use, this includes but is not limited to:

- • desk based research and key sources (e.g. Global Slavery Index)
- • engagement with OFGEM/other regulators.
- • supplier due-diligence questionnaires

The Triton procurement team is responsible for assessing risks of modern slavery when engaging first-tier suppliers and ensuring compliance with relevant policies.

When engaging suppliers in connection with capital projects, from time to time, we carry out visits to the suppliers' factories. On such visits our teams will consider and report on modern slavery concerns.

Triton Group reporting

The Board of Directors and representatives of senior management of the Triton Group meet quarterly at Board meetings and any incidents or concerns around modern slavery are raised during such meetings.

The Triton Group are overseen by a management committee which consists of a subset of the Board of Directors and senior management, including the Chief Executive Officer. The management committee meets monthly and reports on important and pertinent business matters which includes any health and safety incidents and any matters pertaining to compliance breaches (including modern slavery).

The senior management team meet regularly (no less than weekly) and discuss matters related to the Triton Group. Any incidents or concerns relating to modern slavery would be raised at these meetings.

All employees and persons engaged by the Triton Group may report concerns related to modern slavery or human trafficking in accordance with Triton Group policies. This includes in accordance with, but not limited to, the following policies:

- Anti-slavery and human trafficking policy
- Anti- corruption and bribery policy
- Whistleblowing policy
- Grievance policy
- Equal opportunities policy
- Staff handbook

The Triton Group operate many core functions through a centralised team based at the head office location. Operational teams based at specific sites may have day to day ownership and oversight of

purchasing activities but these are supported and overseen by a central Triton Group procurement function.

This statement has been jointly produced between all Triton Group entities and reflects the Triton Group's activities, policies and procedures in relation to modern slavery and human trafficking.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide compulsory online training to all employees which covers:

- Initial steps to be taken if slavery or human trafficking is suspected
- Steps to escalate potential slavery or human trafficking issues to relevant parties

We recognise the importance of training and continuous developments in this area and therefore training in respect of modern slavery and human trafficking is compulsory and failure to undertake the training results in internal escalation.

In the year 2024 we:

- Provided all new employees with business ethics training which is a mandatory requirement when joining the business. Business ethics training includes modern slavery, whistleblowing and other ethical matters. The training was provided by iHASCO as online training.
- All employees of the business have undergone business ethics training which is renewed from time to time as determined by the business.

Training provided to employees is through an external provider iHASCO².

Our effectiveness in combating slavery and human trafficking

We are committed to continuous improvement in mapping supply chains and understanding our business and our supply chains.

We have completed a desktop exercise to look at country risk for prevalence of modern slavery at the Tier 1 level. This review did not identify any high risk of prevalence of modern slavery in our Tier 1 supply chain.

² <https://www.ihasco.co.uk/courses/detail/business-compliance-essentials-training>

We are in the process of creating a supplier code of conduct which we will supply to all new suppliers in connection with our business activities. We will expect all suppliers to adhere to the provisions of that supplier code of conduct. Once prepared the supplier code of conduct will be published on our website.

Further to the above, we are also in the process of developing our supplier due diligence process, to understand more regarding our tier 1 suppliers' actions to map their own supply chains and also assess risk for prevalence of modern slavery in their supply chains. This will help us to understand risks of modern slavery further down the supply chain and also allow us to put appropriate action plans in place should risk of modern slavery be identified.

Impact

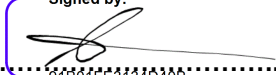
This year we have carried out a review of the following policies to ensure ongoing compliance and good practice:

- Anti-slavery and human trafficking policy
- Anti-corruption and bribery policy
- Whistleblowing policy
- Equal Opportunities
- Triton Power (Triton) Policy Statements
- Staff Handbook

These policies have been reissued to our business to ensure visibility to all employees and have been shared with suppliers where appropriate.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Triton Group's slavery and human trafficking statement for the financial year ending 31 December 2024. It was approved by the Board on 19 June 2025.

Signed by:



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Magne Andre Hovden

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Director

