

## MODERN SLAVERY STATEMENT

### Introduction

This statement is made by ERG International UK Limited (ERG UK) in accordance with Section 54 of the Modern Slavery Act 2015 (“the Modern Slavery Act”) for the financial year ending 31<sup>st</sup> December 2023.

At ERG UK, we take our responsibility to combat modern slavery and human trafficking very seriously. This statement outlines our approach to playing our part in the global fight against modern slavery and human trafficking, and our commitment to developing policies and procedures for addressing this risk in the context of our operations. The same also applies in respect of those we contract with and our supply chains to the extent that we are in a position to positively influence them.

ERG UK reviews and approves this Modern Slavery Statement annually.

### Our Business, Organisational Structure & Supply Chains

ERG UK is an infrastructure developer and total solutions provider that has operations in the UK and globally, and originates, develops, designs, builds, and invests in long-term large-scale infrastructure operations at an international level. ERG UK contracts with clients to provide integrated financing, design, engineering and construction solutions, delivering sustainable and comprehensive projects in the energy, water and transportation sectors.

The majority of our employees are office- or project-based, and thus the key risk area for modern slavery is within the procurement and supply chain activities undertaken through our joint ventures, partners and suppliers in the UK and internationally. Within our direct company operations, our supply chain includes the procurement of contractors and intangible assets such as computer software or licenses. We also contract suppliers for procuring office-related goods and services for our employees.

### Policies on Slavery & Human Trafficking

We have zero tolerance for the use of child or forced labour on our projects and operations, and we commit to not knowingly do business with contractors, subcontractors, business partners or vendors who violate these practices or the human rights of those working on their behalf.

In 2023, we commenced drafting our Anti-Slavery Policy that sets out our expectations and best practices for all employees, suppliers or affiliated third parties to ERG UK with regards to compliance with local labour laws as a minimum regarding child and forced labour, human trafficking and modern slavery. It also reflects our commitment to acting ethically and with integrity in all our business relationships. Where such regulation is insufficient, the Anti-Slavery Policy requires compliance with international standards such as the International Labour Organisation (ILO) Conventions.

We also have a company-wide Whistleblowing Policy that is applicable to all employees, officers, consultants, contractors, casual workers, and agency workers so that whistleblowing concerns including, but not limited to, modern slavery, human trafficking, bribery, fraud, any criminal activity, and health and safety risks can be reported confidentially.

### **Due Diligence Processes**

The international scope of our project-related activities and services means that we strive to work to the highest international and local standards. These include the International Finance Corporation (IFC) Performance Standards on Environmental and Social (E&S) Sustainability and the Equator Principles IV. Such standards require us to undertake a full E&S due diligence on our projects, through which we aim to identify and mitigate the risks of modern slavery and human trafficking within our supply chains, and ensure that we are compliant with national employment and labour laws throughout the duration of project activities.

In 2023, we also conducted a thorough review of our contractual documentation to include appropriate modern slavery provisions.

We will continue to assess any cases of non-compliance as and when they are identified on an individual basis and take action as required.

### **Training**

Our employees are required to be familiar with and comply with all our policies and procedures in our employee handbook, including those on whistleblowing and incident management. This Modern Slavery Statement is also internally distributed to ensure awareness across the company.

We have conducted mandatory modern slavery training for our employees in 2023. The training provides awareness of what modern slavery is and how to spot its potential signs in domestic and international contexts. It also informs staff on how to respond or report should they have any concerns or suspicions regarding acts of modern slavery.

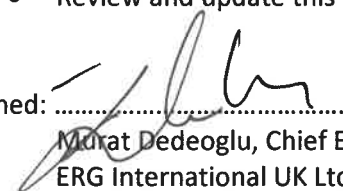
We plan to incorporate the training into the company employee onboarding process going forward.

### **Continuous Improvement**


We are committed to transparency and accountability in our efforts to combat modern slavery in our supply chains. In the coming year, we plan to:

- Finalise the anti-slavery policy to come into effect in 2024.
- Finalise the Supplier Code of Conduct to come into effect within the next two years.
- Continue further training for our employees including implementing our Anti-Slavery Policy and raising awareness about modern slavery and human trafficking, to ensure that they are equipped to identify and report any potential incidents of modern slavery in our operations or supply chains.

- Track the percentage of employees who have participated in the modern slavery awareness training as a key performance indicator.
- Track the number of grievances received concerning modern slavery or forced labour on our projects and operations.
- Review and update this Modern Slavery Statement on an annual basis.

Signed: 

Murat Dedeoglu, Chief Executive Officer  
ERG International UK Ltd.

Date:  2024