

Integrated Management System

Modern Slavery Statement v1.3

Date: July 2025

Prepared by: Corporate Compliance

Modern Slavery and Human Trafficking Statement

For the Financial Year Ending 31st October 2024

At Sustainable Energy First, we are committed to conducting our business ethically, responsibly, and with integrity. As part of this commitment, we make the following statement pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) for the financial year ending 31st October 2024.

Our Commitment

Sustainable Energy First supports the principles of the Act and recognises our responsibility to ensure that modern slavery, human trafficking, and all forms of forced or involuntary labour have no place in our business operations or supply chain. We are committed to being transparent in our practices and expect the same high standards from all of our suppliers, contractors, and business partners.

About Our Business

Sustainable Energy First is a UK-based energy and sustainability consultancy. As a certified B Corporation, our purpose is rooted in creating positive impact, for our clients, our people, and the planet. Our supply chain includes national and multinational providers of goods and services, including professional services, IT, office operations, and energy-related products and infrastructure.

Our Policy on Modern Slavery

Our Modern Slavery Policy reflects our commitment to:

- Acting ethically and with integrity in all business relationships.
- Implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chains.
- Promoting awareness and responsibility at every level of our organisation.

This policy applies to all colleagues, contractors, and business partners and is supported by other related policies.

What We've Done So Far

We have taken the following steps to mitigate the risk of modern slavery in our business and supply chain:

- ✓ Circulated our Modern Slavery Statement internally to all colleagues, reinforcing our collective responsibility to uphold ethical business conduct.
- ✓ Reviewed and updated internal policies and training materials to include clear references to the risks of modern slavery and human trafficking.

- ✓ Maintained and promoted our Protected Disclosure Policy (Whistleblowing Policy), which enables all colleagues and stakeholders to raise concerns anonymously and without fear of retaliation.
- ✓ Conducted a review of our supply base, identifying potential risk areas based on geography, category of goods/services, and vendor practices.

Our Next Steps

Looking ahead, we are committed to building on this foundation and will take the following actions:

- Continue to assess modern slavery risk across all areas of our business and supply chain as part of our broader risk management programme.
- Integrate modern slavery considerations into our procurement process and supplier onboarding, including relevant due diligence and contract clauses.
- Explore additional awareness training for colleagues and managers, especially those involved in recruitment, procurement, and supply chain management.
- Monitor and report on the effectiveness of our actions and continue to look for ways to strengthen our practices.

Accountability

Responsibility for this statement and the associated actions rests with our Senior Leadership Team and is managed by our People & Culture and Compliance functions. Sustainable Energy First is committed to continual improvement, transparency, and taking meaningful action to prevent human rights abuses wherever we operate.

This statement has been approved by the Board of Directors and will be reviewed annually.



Jason Crofts Aherne

Corporate Compliance Manager

**Just contact one of our
friendly people team
for more information
or if you have any
questions**

Certified



Corporation

This company meets high
standards of social and
environmental impact.

INVESTORS IN PEOPLE
We invest in people Gold