

Dalkia UK Policy Statement

Modern Slavery and Human Trafficking Statement 2025

This statement is made in accordance with the requirements of the Modern Slavery Act 2015. Dalkia UK has a zero-tolerance approach to modern slavery and is committed to working to ensure that our own operations, and those of our supply chains, are appropriately evaluating the risks of modern slavery. We are working to mitigate these risks as far as possible through our commitment to ethical business. We strive to improve our standards of ethical behaviour continuously and our commitment to ethical business practice is outlined in our Code of Conduct and accompanying Whistleblowing Policy. Our boards of directors, executive management teams, managers and staff members are all fully committed to ensuring this outcome.

This statement is made by and on behalf of Dalkia Group Limited and its subsidiaries, which make up the Dalkia UK group as a whole (together in this statement, referred to as Dalkia UK). Those subsidiaries of Dalkia Group Limited that are required to make their own statement under the Modern Slavery Act 2015 have adopted this statement.

This statement covers the financial year ending 31 December 2025 and reflects updated government guidance issued in March 2025.

Policies

Dalkia UK has a number of policies, procedures and processes that support us to:

- Reduce the risk of slavery and human trafficking occurring in our business and supply chain;
- Provide adequate protection for whistleblowers; &
- Operate a robust supplier onboarding process.

Dalkia UK Policy Statement

Modern Slavery and Human Trafficking Statement 2025

These policies include:

- A comprehensive Code of Conduct and accompanying policy on whistleblowing.
 - The Code of Conduct reminds our people that we are an organisation which acts honestly and ethically. Employees are reminded that they should report any concerns of potentially illegal activities, unethical conduct or anything that might prejudice the business either to the appropriate management or in accordance with the Whistleblower Policy.
 - A whistleblowing policy which allows staff to report either through an independent Dalkia UK service or utilise the service provided by EDF Group.
- Employment policies, including:
 - Recruitment processes for carrying out checks on the right to work in the UK;
 - Up-to-date employment contracts which comply with UK labour laws, for example, in respect of the national minimum wage, making deductions from wages, notice periods and working time;
 - Equal opportunities policy;
 - Anti-harassment policy; &
 - Grievance procedures.
- Corporate social responsibility policies, including on health & safety and sustainability.
- Training and competence programmes for employees and subcontractors, including ensuring our employees and subcontractors have the minimum levels of qualifications required to deliver our contracts.
- Standard purchase order terms and conditions for our key suppliers, which require them to:
 - Comply with the Modern Slavery Act 2015 and all other anti-slavery & human trafficking legislation; &
 - Not engage in any activities constituting an infringement of the United Nations Guiding Principles on Business & Human Rights.

Dalkia UK Policy Statement

Modern Slavery and Human Trafficking Statement 2025

- A breach of anti-slavery laws by a supplier constitutes a material breach of contract and is deemed not to be remediable.

These policies are overseen by senior management and are aligned with recognised international standards, including the United Nations Guiding Principles on Business and Human Rights.

Organisation structure and supply chains

Dalkia UK employs around 5,300 people across business units based solely within the United Kingdom, with the exception of some minor activities in Ireland. Accordingly, we consider the geographic risk of slavery and human trafficking to be relatively low. Nevertheless, we consider the main sector-related risks of our business as a technical services company that delivers projects, facilities management and systems integration to a large number of clients to be either within our supply chain (and suppliers to our supply chain) and to a much lesser degree, within our own workforce (including agency workers). We are committed to acting ethically and with integrity in all our business transactions. The areas addressed are as follows:

Workforce – Training on modern slavery and trafficking

We have induction and training processes to ensure staff members are aware of the Modern Slavery Act, together with its definitions of slavery and human trafficking. A e-learning modern slavery course is available to all staff and mandatory every two years for all managers and supervisors and available as an optional course for all staff. The course covers: the global scale of modern slavery; the Modern Slavery act 2015; what modern slavery is; how people are coerced; the signs of modern slavery; and how to respond if modern slavery is suspected in the workplace. The

Dalkia UK Policy Statement

Modern Slavery and Human Trafficking Statement 2025

course ends with a mandatory exam requiring an 80% pass mark. On completion of the course, participants are provided with a 20-page booklet covering the key learning, for future reference. In 2025, 567 Dalkia managers and supervisors completed the course.

Managers and supervisors are also trained on how to recognise victims of modern slavery through a range of physical, behavioural and environmental indicators. Managers and supervisors are encouraged to conduct regular welfare interviews with team members, as well as providing toolbox talks on modern slavery to all operational staff.

A bespoke 'Understanding Modern Slavery' toolbox talk has been developed for the relatively small number of employees who do not have easy access to Dalkia's IT platforms and e-learning resources. This cohort comprises mainly cleaning and catering staff, a group potentially at higher risk of exploitation. The toolbox talk focusses on explaining modern slavery in its various forms, how to recognise the signs that someone is being exploited and how suspicions or concerns should be raised. During 2026, this toolbox talk was delivered to over 150 staff in small groups across multiple locations.

Dalkia maintains an independent and confidential whistleblower service. This allows staff to report suspected wrongdoings in the knowledge that their concerns will be taken seriously and appropriately investigated. The service is available to all Dalkia staff and supplements alternative reporting channels. The existence of the whistleblower service and accompanying procedure is briefed to all staff on induction and is a regular topic for toolbox talks and internal communications. It is formally trained through the Dalkia Code of Conduct, which is a mandatory e-learning course for all staff which must be taken every two years.

Dalkia UK Policy Statement

Modern Slavery and Human Trafficking Statement 2025

Recruitment

To mitigate modern slavery during recruitment, Dalkia employs robust candidate vetting and onboarding processes. These will include:

- **Identity verification:** Dalkia reviews original physical documents to confirm the individual's identity, history and legal right to work. In respect of construction and maintenance roles, identity will be further validated against the individual's CSCS (Construction Skills Certification Scheme) card or similar.
- **Direct banking verification:** Dalkia performs automated bank detail checks to ensure that wages are paid to an account in the name of the employee.
- **Independent communication:** Interviews are conducted individually to ensure the applicant is not under the duress or control of a third party. All new joiners must attend a mandatory Dalkia induction course as part of a structured on-boarding process, while operative and technical staff also attend in-person site inductions.

Supply Chain – Due diligence processes

The overwhelming majority of our supply chain is based in the UK, albeit some products and components do come from overseas. We have a supplier onboarding process that seeks to ensure that our supply chain consists of organisations that have good quality controls, suitable financial standing and are compliant with UK legislation. We consider this to be an initial risk management step to ensuring our supply chain conducts itself appropriately and therefore adopts anti-slavery practices. Furthermore, our standard supplier terms and conditions for working with Dalkia UK contain specific provisions relating to the Modern Slavery Act and social responsibility.

Dalkia UK Policy Statement

Modern Slavery and Human Trafficking Statement 2025

Risk assessment and management

Each of the five main Dalkia UK businesses maintains a bespoke modern slavery risk register. Ownership of each register sits with a member of the senior executive team within each business and each register is reviewed biannually by that team. Each register records the modern slavery risk scenarios specific to each business, assesses the severity and likelihood of each and identifies the mitigations, both in place and planned. A residual score show assesses the scenario risk, post mitigation.

Periodically, the five individual registers are collated to provide an overall picture of the modern slavery risk faced by Dalkia UK and identify the highest areas of vulnerability overall. As at 31st December 2025, the highest areas of risk were identified as:

1. **Providing Services:** We provide various facilities management services to our clients. Typically, the more technically based services such as equipment maintenance, are provided inhouse by our own teams or by specialist subcontractors. Both are, by nature, highly trained and specialist skill sets and deemed to be low risk of modern slavery. However, on a small number of contracts, we provide soft services such as cleaning, catering, reception and reprographic services. These are delivered either in house or through third-party providers. Such soft services could be considered at a potentially higher risk of modern slavery existing. We seek to mitigate this risk through the following measures:
 - Robust candidate vetting and onboarding processes
 - The monitoring of working hours of staff via site signing-in processes and timesheets;

Dalkia UK Policy Statement

Modern Slavery and Human Trafficking Statement 2025

- The utilisation of reputable service providers only. Our preference is for those providers with whom we have long-term and established relationships; &
 - We seek to employ subcontractors on our standard terms & conditions. These stipulate the requirement to work in compliance with the Modern Slavery Act and the UN Guiding Principles on Business and Human Rights.
2. **Procuring Goods:** The other main area of risk is around the procurement of goods and materials. The overwhelming majority of our supply chain is based in the UK. We have a supplier on-boarding process that seeks to ensure that our supply chain consists of organisations that have good quality controls. Further, our standard supplier terms and conditions for working with Dalkia UK contain specific provisions relating to the Modern Slavery Act compliance.

We adopt tender specification requirements to set expectations of how goods and services should be delivered and to help us promote greater awareness of modern slavery risks among our supply chain. Tender evaluation processes have been designed to establish whether suppliers can meet these expectations. Where possible, we award contracts to companies registered in the UK, with labour only being used from preferred supplier lists and approved framework agency partners. This means that our suppliers are likely to match our levels of transparency in relation to UK employment law and the Modern Slavery Act. Under the Dalkia Group Purchase and Subcontract Terms & Conditions, we must be formally notified of, and approve, any intention to sub-let any element of the scope of works and have the right to carry out selective auditing of a supplier's manufacturing facilities for compliance purposes. This is all covered within the Group Purchase Order Terms & Conditions and includes clauses covering right-to-work compliance, the prevention of forced and illegal labour, the prevention of discrimination and child labour, compliance with UK working-time legislation, and the payment of minimum wages in the UK.

Dalkia UK Policy Statement

Modern Slavery and Human Trafficking Statement 2025

The above core documents, updated processes and the targeted awareness of modern slavery and human trafficking within our supply chain help us to ensure that Dalkia UK complies with the spirit and requirements of the Modern Slavery Act.

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Modern Slavery and Human Trafficking Statement for the financial year ending 31 December 2025, as approved by the relevant boards of directors.

Signed:

Name: David Tomblin

Title: Group CFO

This statement is adopted by the following companies:

- Dalkia Group Limited
- Capula Limited
- Dalkia Energy Services Limited
- Dalkia Engineering Limited
- Dalkia Facilities Limited
- Dalkia Facilities Northern UK Limited
- Dalkia Operations Limited