

Modern Slavery and Human Trafficking Statement

For the year ended 31 March 2026



INTRODUCTION

Power NI Energy Limited (“Power NI or “the Company”) fully supports the aims of the Modern Slavery Act 2015 (“the Act”) and is committed to tackling slavery and human trafficking where it can. This statement is made pursuant to section 54(1) of the Act and constitutes the Company’s slavery and human trafficking statement for the financial year ended 31 March 2026.

Power NI is committed to the highest level of ethical standards and sound governance arrangements and prohibits all forms of slavery and human trafficking in all its different forms in any part of its businesses and in its supply chain.

ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Power NI’s parent company is Energia Group NI Holdings Limited and is part of the Energia Group which includes Energia Group Limited and its subsidiary undertakings (“the Group”). Energia Group Limited is registered in the Cayman Islands. The Group is the leading independent energy company in Ireland and operates under three business units: Renewables, Flexible Generation and Customer Solutions. The Renewables business owns and operates renewable electricity generation assets and purchases renewable electricity from third party generators throughout Ireland. The Flexible Generation business owns and operates conventional electricity generation assets in the RoI, a battery storage facility in Northern Ireland and an emergency gas generation plant in the RoI. The Customer Solutions business supplies electricity to customers in the RoI and Northern Ireland, and gas to customers in the RoI.

The Company operates in Northern Ireland, supplying electricity to residential and commercial customers through its Power NI business and also purchases renewable electricity from fellow Group subsidiaries and third-party generators in Northern Ireland. The Company had 524 employees at 31 March 2026. Turnover for the year ended 31 March 2026 was £971.6m. The majority of the Company’s supply chain is sourced from within the UK and the RoI.

There have been no changes in the principal activities of the Company for the financial year ended 31 March 2026.

The Company Secretary is responsible for the management of modern slavery within the Company.

RELEVANT POLICIES

We are committed to taking appropriate measures to protect labour rights, promote safe working environments, eradicate forced labour and ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking 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 mitigate modern slavery and human trafficking risk in our supply chains.

Some of the other Group policies which are considered relevant to the management of modern slavery risks faced by the Company include:

- Code of Conduct – formalises the high standards of behaviour and performance expected from employees e.g. to comply with all lawful directions given by or under the authority of the employer and with all company rules, regulations, policies and

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procedures. Employees are also expected to give due consideration to the safety and welfare of others, including by complying with the provisions of legislation on health and safety and working conditions.

- Equal Opportunities Policy – opposes all forms of unlawful discrimination and commits to the operation of fairness and equality at work and in the services provided to customers.
- Recruitment and Selection Policy – commits that those involved in recruitment will comply with the principles of equality of opportunity and are appropriately trained in good recruitment practices.
- Dignity at Work Policy – supports dignity at work for all employees, provides guidance for the resolution of issues and prevention of recurrence and underlines our commitment to equality and dignity at work for all to promote an environment free from bullying and harassment.
- Grievance procedure – procedures which allows for an employee who has a concern, problem or complaint about some aspect of their work to raise a grievance.
- Anti-corruption and Bribery Policy – which commits the Group to uphold all laws relevant to countering bribery and corruption in all jurisdictions in which it operates.
- Whistleblowing – procedures to allow employees, in the event that they discover serious malpractice or wrongdoing, to voice concerns in a responsible and effective manner without fear of reprisal.

SUSTAINABLE DEVELOPMENT GOALS (“SDG”)

The Group is committed to respecting internationally recognised human rights and is in the process of aligning its activities to the UN’s Guiding Principles (UNGP’s) on Business and Human Rights. The Group has aligned its activities with the United Nations SDG 8 Decent Work and Economic Growth and reports on progress against this and other priority SDGs in its Responsible Business Report. Within SDG 8 there is a commitment to take measures to protect labour rights, promote safe working environments, eradicate forced labour and end modern slavery and human trafficking.

By aligning its activities to the UNGP’s on Business and Human Rights the Group has a responsibility to understand the risks within its own business and supply chain and to take actions to reduce those risks. This includes conducting human rights assessments, including modern slavery risks. During FY26 the Group advanced preparations for its first saliency assessment to determine the most salient human rights risks relevant to it and the effectiveness of mitigating actions that are in place. This work is facilitated by the Group’s Human Rights Working Group which comprises representatives from each of the Group’s business segments, including Power NI, and a number of core functions including Health and Safety, Procurement, Risk and ESG.

WELLBEING INITIATIVES

The Company is committed to ensuring its employees are well looked after, cared for and supported in all that they do. Wellness is a core part of ensuring the Company operates effectively. Our wellbeing programme is underpinned by 3 pillars: Mind, Body and Life and is available to all employees. Employees are encouraged to reach out to our dedicated professional counselling team for support should they wish to do so.

The Company recognises the importance of employee engagement and has a number of established mechanisms to support employee engagement through communication forums and employee groups.

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THE MODERN SLAVERY AND HUMAN TRAFFICKING RISK

Our Anti-Slavery and Human Trafficking Policy is key for the Company having in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- Monitor potential risk areas in our supply chains and consider emerging risks of suppliers located within higher risk countries.

We encourage the reporting of concerns by our employees about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier to their line managers or the Company Secretary at the earliest stage possible. If they are unsure on whether to raise a concern they can contact Unseen, an independent charity in the UK, so as to ensure an independent process. Details of Unseen's Modern Slavery Helpline and website information are included in the Group's Anti-Slavery and Human Trafficking Policy. The public can also raise concerns by contacting the Modern Slavery Helpline on 08000 121 700.

SUPPLIER CODE OF CONDUCT

The Group has a mandatory Supplier Code of Conduct which supports its Environmental, Social and Governance (ESG) commitments and includes a section on Human Rights in which suppliers are required to have appropriate procedures in place to comply with the Group's Anti-Slavery and Human Trafficking Policy and all applicable law including the UK Modern Slavery Act 2015.

SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking and have previously written to our suppliers notifying them of our support for the aims of the Act and provided them with a copy of our Anti-Slavery and Human Trafficking Policy.

The Group's procurement policy includes cross references to Modern Slavery and the Anti-Slavery and Human Trafficking Policy.

The Group also employs a Procurement Manager and a Risk Governance Manager who, as part of their roles, ensure that there is a high level of understanding of the risks of slavery and human trafficking in our supply chains and our business.

The Group holds the Business Working Responsibly Mark for responsible and sustainable business practices. The Mark, developed by Business in the Community Ireland and audited by the NSAI, is based on ISO26000.

Supplier Engagement

In November 2025, the Group held its first ESG Supplier Engagement Webinar. The webinar highlighted our expectations that our suppliers will embed best principal practices. Following the webinar, suppliers were asked to respond to an ESG Supply Chain Questionnaire. Questions included confirming that the company pays at least national minimum wage, offer fair employment contracts, have anti-slavery/human trafficking policies in place and have, if applicable, a modern slavery statement aligned to Section 54 of the Modern Slavery Act 2025.

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Training

To improve the understanding of modern slavery risks within the procurement supply chain, select Company staff are encouraged to take CIPS Ethical Procurement refresher training. Furthermore, all Group staff receive online Anti Bribery and Corruption training as part of the Group's compliance training programme. The Company will seek to build on its training programme during 2026/27.

This statement was approved by the Board of Power NI Energy Limited.

A handwritten signature in black ink, appearing to read 'L. J. St. John'.

Director

22 September 2026