

Modern Slavery and Human Trafficking statement

Earls Gate Energy Centre Limited

Financial year ended 31 March 2026

About this statement

This statement is made by Earls Gate Energy Centre Limited (EGEC or the Company) pursuant to section 54(1) of the Modern Slavery Act 2015. It sets out the steps taken by the Company during the financial year ended 31 March 2026 to seek to ensure that slavery and human trafficking were not taking place in its business or supply chains.

EGEC is a joint venture company ultimately owned by Brockwell Energy Limited (BEL) and Encyclis HoldCo Limited (Encyclis), with asset management and related technical and operational services provided by Brockwell Energy Services Limited (BESL). Accordingly, this statement reflects the anti-slavery and human trafficking policies, governance arrangements and due diligence practices applied to EGEC's business through the group frameworks of BEL and, where relevant, Encyclis, together with practices adopted directly by EGEC's operations and maintenance contractor.

Earls Gate Energy Centre Limited's business and supply chains

Earls Gate Energy Centre Limited (registered in Scotland, company number SC484891) owns and operates the Earls Gate Energy Centre, an energy-from-waste (EfW) combined heat and power facility at Earls Road, Grangemouth, Falkirk, Scotland. The facility has capacity to treat up to 274,000 tonnes per year of residual, non-recyclable municipal-type and commercial waste that would otherwise be sent to landfill, using a moving-grate combustion process, a steam turbine and generator, and a flue gas treatment system, to generate up to 23.5MW of electrical output alongside heat and steam.

Heat, steam and electricity are supplied by private wire to neighbouring industrial and chemical manufacturing businesses on the Earls Gate industrial complex at Grangemouth, with surplus electricity exported to the grid under a power purchase agreement. Waste is supplied to the facility under long-term arrangements for the processing of residual household and commercial waste collected across Scotland's central belt and surrounding regions, supporting the Scottish Government's ban on sending biodegradable municipal waste to landfill.

Day-to-day operation and maintenance of the facility is carried out by Kanadevia Inova under an operations and maintenance contract, with asset management provided by BESL. EGEC's principal supply chain relationships include:

- waste collection, haulage and supply arrangements, including municipal and commercial waste contracts and waste transfer and metal recovery services;
- the operations and maintenance contractor and its subcontracted specialist, maintenance and planned outage personnel;
- original equipment manufacturers and suppliers of plant and process equipment (including turbine, boiler, grate and flue gas treatment systems) and associated spare parts, consumables and reagents, including air pollution control residue treatment and boiler refractory and alloy materials;

- construction and engineering contractors engaged for remaining completion works and plant upgrades;
- power off-take and energy trading counterparties, and private-wire industrial customers;
- technical, environmental, engineering, health and safety, legal, financial and insurance consultants; and
- facilities, IT and other professional service providers.

Policies and governance

As a joint venture company, EGEC does not maintain a wholly separate suite of policies. Instead, the management of EGEC's business during the financial year was governed by the anti-slavery, human rights, ethical conduct, procurement and whistleblowing policies maintained by BEL, supplemented by the policies and supplier standards maintained by Encyclis in its capacity as joint venture partner and as an experienced operator of energy-from-waste assets. The principal relevant policies applied were:

- the Anti-Slavery & Human Trafficking Policy and Guidelines (BEL);
- the Human Rights Policy & Guidelines (BEL);
- the Supply Chain & Procurement Policy & Guidelines (BEL);
- the Ethics & Code of Conduct Policy & Guidelines (BEL);
- the Public Interest Disclosure (Whistleblowing) Policy & Guidelines (BEL).

The Anti-Slavery & Human Trafficking Policy applies to BEL and its subsidiaries and joint ventures, including EGEC. It assigns overall responsibility to the Board, day-to-day implementation to the Chief Executive Officer, and responsibility for monitoring its use and effectiveness, responding to queries and auditing relevant internal controls to the Chief Financial Officer. Managers, including those responsible for the operational management of EGEC, are responsible for ensuring that those reporting to them understand and comply with the policy.

The Supply Chain & Procurement Policy, approved on 25 February 2025, applies to corporate procurement and project sites, including EGEC, and establishes standards for supplier selection, engagement and ongoing management, requiring procurement and site management teams to consider ethical conduct, human rights, fair labour practices and regulatory compliance.

BEL's policies underwent a full review during the financial year ending 31 March 2026 to confirm suitability and allocation of management oversight and responsibility.

Supplier due diligence and controls

EGEC's business model, as an operating energy-from-waste facility, means the principal areas of potential risk identified in EGEC's supply chain are:

- waste collection, haulage and processing, including transfer stations and metal or residue recovery activities, where lower-skilled and agency labour may be more prevalent;
- construction, plant upgrade and outage-related subcontracting, particularly where unskilled or short-term labour is engaged; and
- outsourced services such as cleaning, catering and contracted labour supplied during planned maintenance outages.

Direct employment relevant to the operation of EGEC is considered lower risk, as personnel are engaged either directly by BESL under BEL's controlled recruitment processes or by Kanadevia Inova under its own employment and recruitment standards.

BEL's Anti-Slavery & Human Trafficking Policy and Supply Chain & Procurement Policy provide for due diligence when new suppliers are appointed to EGEC and for regular review of existing suppliers, including evaluation of the modern slavery and human trafficking risk presented by each supplier, communication of BEL's expectations, and corrective action, sanctions or termination where standards are not met. Country-of-origin risk associated with imported plant, equipment and spare parts is considered with reference to indices such as the Global Slavery Index.

During the financial year ending March 2026, EGEC's supply chain activity was delivered principally through the continuing use of established suppliers, including its operations and maintenance contractor and long-term waste supply counterparties, together with routine procurement of spare parts, consumables and specialist professional services. No new large-scale construction contracts or fuel supply contracts were entered into during the year necessitating new supplier due diligence.

Training and awareness

The Anti-Slavery & Human Trafficking Policy provides that training on the policy and the modern slavery risks relevant to BEL's business, including EGEC's operations, forms part of the induction process for relevant personnel. This would be relevant to BEL personnel providing services to EGEC as part of BESL.

During the financial year, the policy was briefed to new staff employed by BEL providing such services to EGEC and an e-learning course on modern slavery was assigned, with an annual refresher course to follow. Personnel engaged through Kanadevia Inova receive equivalent training and awareness of modern slavery indicators and reporting routes as part of its own operational induction and ongoing training programme. BEL's expectations regarding modern slavery are communicated to EGEC's suppliers and contractors through onboarding discussions, and contract provisions for major suppliers and contractors confirm the requirement to comply with applicable law.

Reporting concerns and remediation

Relevant personnel, including those working at or in connection with the Earls Gate Energy Centre, are required to report suspected conflicts with the Anti-Slavery & Human Trafficking Policy to the Chief Financial Officer of BEL and may also raise concerns through Brockwell's whistleblowing arrangements or, where applicable, equivalent arrangements maintained by Encyclis or Kanadevia Inova.

The policy protects individuals who raise genuine concerns in good faith and permits disciplinary action, corrective action or termination of supplier and contractor relationships where a breach is established.

EGEC received no reports of suspected modern slavery during the year.

Assessing effectiveness

The Chief Financial Officer of BEL is responsible under the Anti-Slavery & Human Trafficking Policy for monitoring the policy's use and effectiveness and auditing relevant internal controls as they apply to EGEC. BEL's policies also provide for monitoring the performance of EGEC's suppliers and contractors, including its operations and maintenance contractor, with corrective action taken where required.

Due to the continued use of established suppliers and contractors during the year, no quantitative measures specific to modern slavery controls were established for EGEC; ongoing effectiveness was instead assessed through management oversight, site-level supplier monitoring and the wider governance arrangements described above.

Approval and signature

This statement was approved by the board of directors of Earls Gate Energy Centre Limited on 30 September 2026 and signed on its behalf by:

Signature	
Name	Grzegorz Waszkiewicz
Title	Director, Earls Gate Energy Centre Limited
Date	30 September 2026