

MODERN SLAVERY STATEMENT 2025

Phoenix Energy Group

Phoenix Energy Group Holdings Limited (PEGHL)

Phoenix Distribution Holdings Limited (PDHL)

Phoenix Energy Group Limited (PEGL)

Phoenix Energy Services Limited (PESL)

(together the “Phoenix Energy Group”)

For the financial year 1st January 2025 - 31st December 2025

Contents

01

Message from the Group CEO

02

Our Business

03

Our Anti-Slavery Commitment

04

Modern Slavery Policy

05

Supplier Due Diligence

06

Training

07

Governance

08

Statement



Message From The Group CEO



This statement outlines our commitment to preventing modern slavery within our business operations and our supply chain, together with the actions we are taking to promote transparency, ethical practices and human rights.

This financial year we continued our focus on maintaining and refining our policies and procedures to prevent modern slavery, which included enhancements to our risk assessment processes and strengthening our supplier due diligence arrangements.

Going forward for the next 12 months, we will continue to seek out innovative initiatives and solutions that can effectively tackle the issue of modern slavery and to ensure that as an organisation we do as much as we can to combat this issue.

A handwritten signature in black ink, reading 'Kailash Chada'.

Kailash Chada
Group Chief Executive Officer
Phoenix Energy

Our Business

Phoenix Energy Group Limited (PEGL) owns and operates the largest gas distribution network in Northern Ireland, providing the safe and secure distribution of natural gas to more than 260,000 domestic and business customers connected to its network. With a gas pipeline that extends across more than 4,000km, Phoenix is responsible for the maintenance of its infrastructure as well as the 24/7 operation and transportation platform for natural gas suppliers and customers across its licenced area which encompasses Greater Belfast, Larne and East Down.

Phoenix has a clear vision to be recognised for excellence as a world leading energy utility whilst maintaining the highest safety standards. Phoenix and its owners are wholly committed to supporting the business in its mission to provide a safe and reliable gas service and support all of the communities we serve.

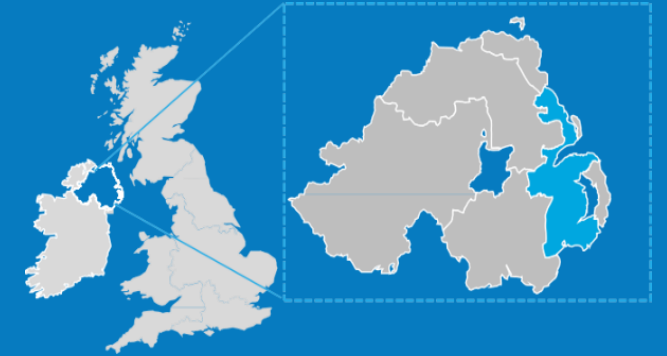
Phoenix Energy Services Limited (PESL) is a specialist provider of downstream services into the Northern Ireland energy market. Phoenix Energy Group Holdings Limited (the “Phoenix Group”) and Phoenix Distribution Holdings Limited are non-trading holding companies within the Group.

Our Anti-Slavery Commitment

The Phoenix Group and its owners are fully committed to ensuring that the group complies with all applicable legal requirements including, without limitation, the Modern Slavery Act 2015.

The Phoenix Group and its owners have a zero tolerance to slavery and human trafficking and are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

To date, we have not identified any modern slavery within the Phoenix Group.



Modern Slavery Policy

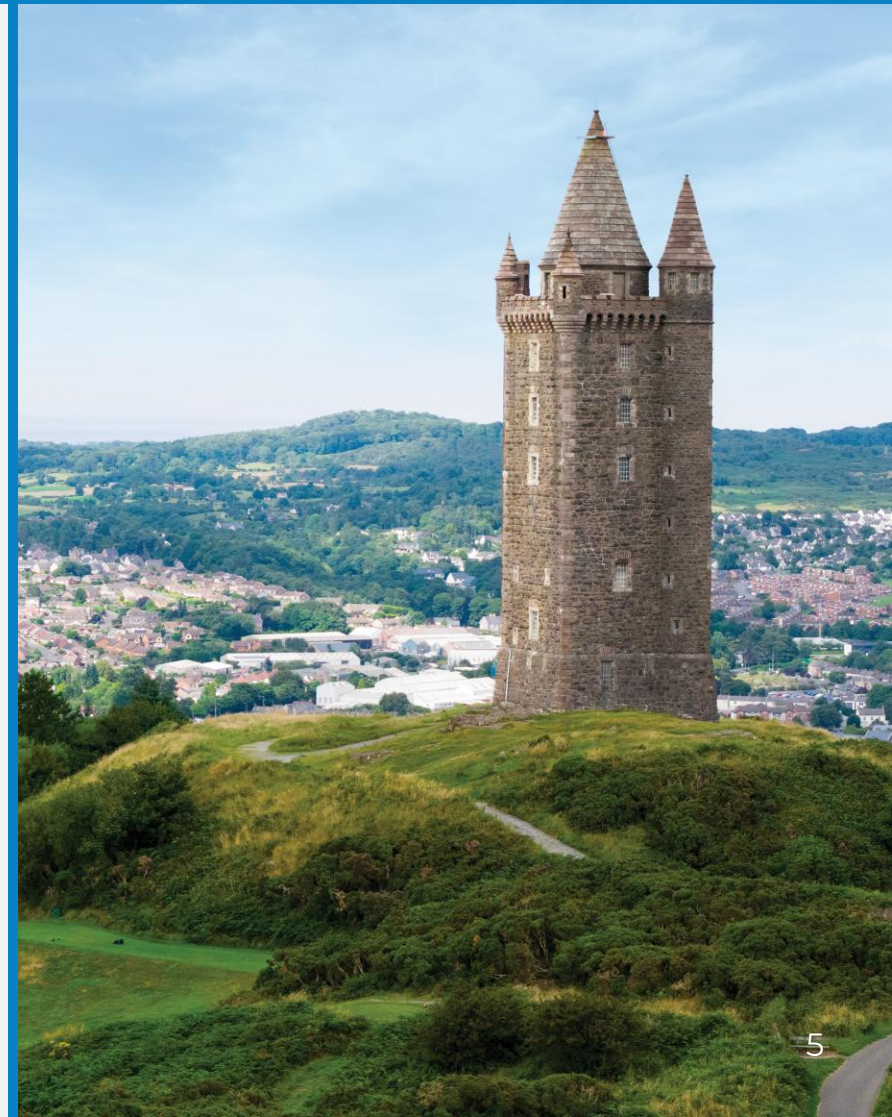
The Phoenix Group has adopted a Modern Slavery Policy. It reflects our commitment to acting ethically and ensuring Modern Slavery is not taking place in our business or supply chains. This Policy has been sent to all existing suppliers and also promoted to employees and other colleagues.

We encourage our employees and contractors to report any slavery, human trafficking or other ethical concerns through our whistleblowing arrangements. Our confidential reporting process allows colleagues to raise concerns through multiple channels, including direct reporting to line management, HR managers, or through an independent whistleblowing service.

To strengthen our internal reporting mechanisms, our policies provide external reporting channels through an independent organisation that offers confidential services for individuals to report concerns via telephone or online. This ensures that anyone with concerns about modern slavery can report them safely, and without fear of reprisal.

The scope of our Whistleblowing Policy specifically includes the reporting of Modern Slavery concerns, with robust protections in place for those who raise genuine concerns. All reports are treated confidentially and investigated thoroughly, with appropriate escalation procedures to ensure swift and effective response.

External parties, including contractor and supplier personnel, are also encouraged to report concerns through our established reporting channels, ensuring comprehensive coverage across our entire operational network.



Supplier Due Diligence



All suppliers wishing to conduct business with Phoenix must complete a comprehensive supplier due diligence questionnaire including modern slavery compliance. This forms part of a rigorous supplier approval process that includes pre-qualification assessment of HSE compliance, company and financial performance, employment practices, subcontractor arrangements, and modern slavery policies.

Through our ongoing supplier risk assessment processes, Phoenix Group conducts enhanced due diligence on suppliers identified as presenting higher modern slavery risks. These suppliers are subject to additional scrutiny through direct engagement and regular monitoring throughout the contract lifecycle.

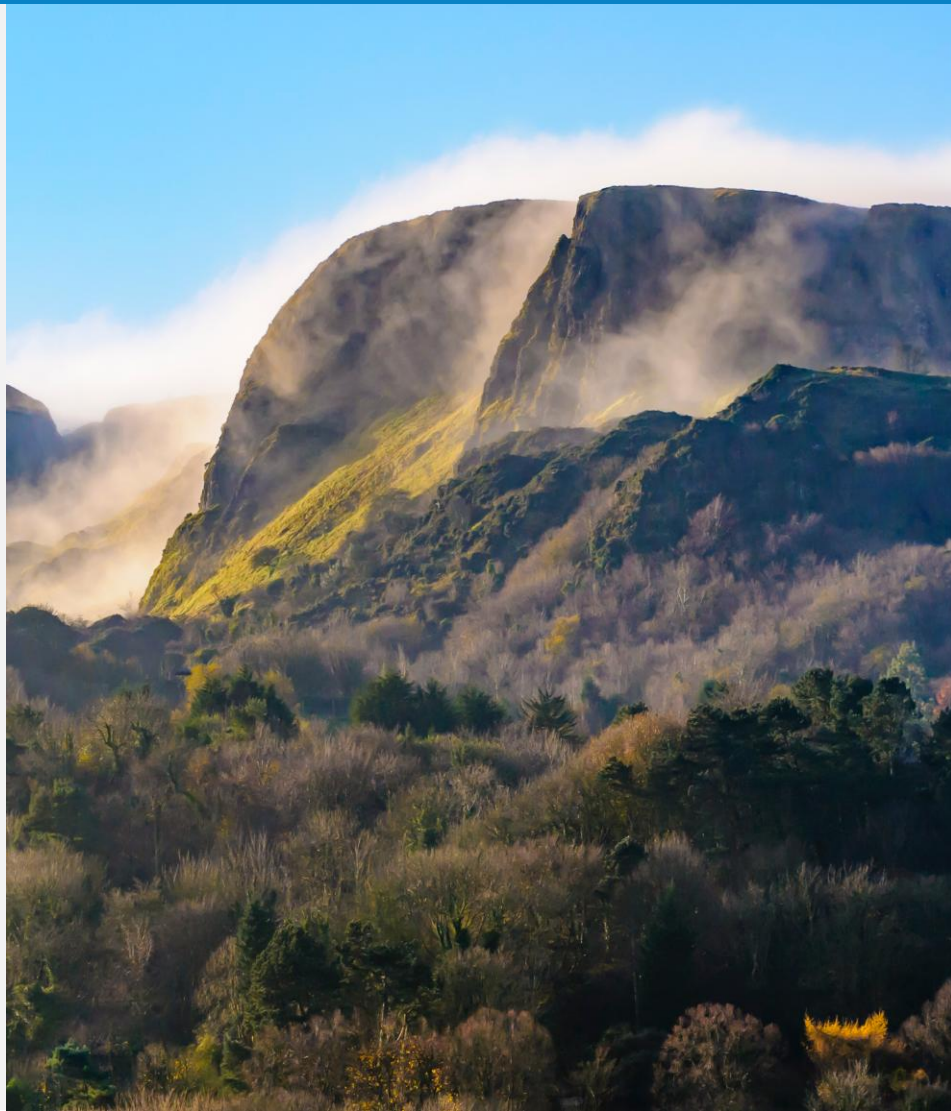
Higher risk suppliers are required to provide annual compliance confirmations covering their own operations and subcontractor arrangements, along with

supporting documentation including modern slavery policies and transparency statements where applicable.

All Tier 1 suppliers are required to cascade modern slavery compliance requirements through their own supply chains to ensure comprehensive coverage across multiple tiers of suppliers.

We maintain the contractual right to terminate agreements for modern slavery violations.

Training



All new employees receive modern slavery awareness as part of their induction programme, which sets out our commitment as a business to eliminate modern slavery and the role each individual plays in achieving this objective. This training covers the identification of potential modern slavery indicators and reporting procedures.

Managers and supervisors receive enhanced training through our corporate governance programme, including modern slavery identification, risk assessment, and response procedures. This ensures our managers can effectively support the implementation of our modern slavery prevention measures.

Training has also been provided to the Independent Non-Executive Directors and the Executive Management Team to ensure board-level understanding of modern slavery risks and the company's approach to prevention and response.

We maintain comprehensive training records with formal audit trails to demonstrate compliance and effectiveness of our training programmes. Training content is regularly reviewed and updated to reflect evolving best practice and regulatory guidance.

All training is designed to be proportionate to the level of risk and responsibility, ensuring that colleagues receive appropriate knowledge and skills for their roles whilst maintaining awareness of modern slavery risks across the entire organisation.

Governance

Modern slavery prevention at Phoenix operates under clear governance arrangements with defined accountability and oversight mechanisms:

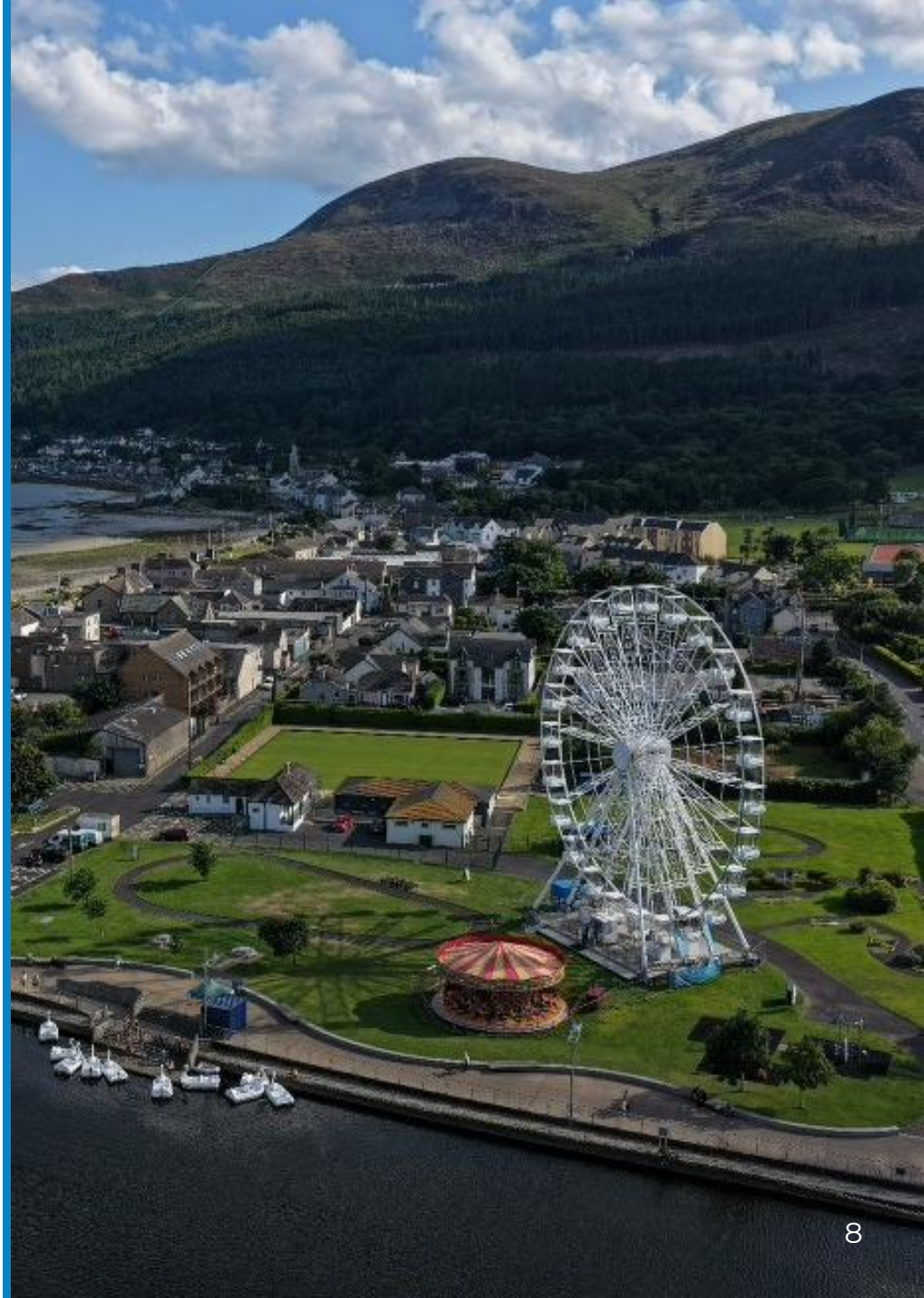
The Group CEO holds executive responsibility for our modern slavery programme, supported by dedicated policy leads who manage day-to-day implementation and monitoring activities.

Board-level oversight is maintained through the annual review and approval of our transparency statement. Any suspected or confirmed modern slavery incidents would be reported to the board immediately, though to date no such instances have been identified.

We have engaged external advisors to provide training and guidance on best practice and regulatory requirements to our board on a regular basis, and particularly during the development of our modern slavery prevention framework.

Annual transparency statements are reviewed and approved at board level, with formal sign-off to ensure appropriate accountability and oversight of our modern slavery commitments.

A modern slavery risk assessment is conducted on a regular basis, with findings integrated into our broader risk management framework.



Statement

This statement is made by the Phoenix Group pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the Phoenix Group's slavery and human trafficking statement for the financial year ending 31 December 2025.



*Kailash Chada
Group Chief Executive Officer
Phoenix Energy*

December 2025