Modern Slavery Statement

1. Document Classification

We have four classification levels within Aurora Utilities. This document's classification is indicated on the front cover.

Classification	Rules
Highly confidential	Any documents classified as 'Highly confidential' must be marked on the front page and the top of every page.
Confidential	Any documents classified as 'Confidential' must be marked on the front page and the top of every page.
Internal	Any documents classified as 'Internal' must be marked on the front page.
Public	Documents classified as 'Public' should be labelled 'Approved for publication' with the current date on the front page.

Version			
Version	**Author**	**Date**	**Reason**
1.0	Gina Littlecott	25/03/2025	
2.0	Gina Littlecott	11/11/2025	
3.0	Alex Lane	23/10/2026	Re-issued for financial year ended 31 March 2026; legal and consistency review

Sign off			
Version	Author	**Position**	**Date**
1.0	Simon Reilly	CEO	25/03/2025
2.0	Simon Reilly	CEO	11/11/2025
3.0	Simon Reilly	Director and CEO	27/10/2026

October 2026
Classification: Public Internal

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1. The Organisation

This statement applies to **Aurora Utilities** (referred to in this statement as 'the Company'). The information included in the statement refers to the financial year 2026/27.

The Company is based at the following address with all employees working from that location or at times, remotely or at client's sites.

42 Lower Ground Floor,
New Broad Street,
London, EC2M 1JD

2. Organisation Structure

The Chief Executive Officer is Simon Reilly, and **the Senior Leadership Team** currently includes Chief Commercial Officer, Chief Operating Officer, Chief Financial Officer, Head of People, Delivery Director, Business Development Director and Account Director.

The Board of the Company is made up of senior appointments in ISQ.

The main activities of the Company include:

- **Design & Development:** Effectively planning & constructing new electricity distribution networks to serve both residential and commercial development.
- **Network Adoption:** The acquisition of electricity networks constructed by NERs accredited Independent Connection Providers (ICPs).
- **Operation & Maintenance:** The provision of an efficient and resilient electricity network to all end users which is achieved by effective maintenance and management of the network.
- **Customer Service:** The provision of excellent customer service to end users of the network ensuring that any identified issues, including power outages or any service-related issues are addressed adequately and in a timely manner.

3. Definitions

The Company considers that modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse.
- Being dehumanised, treated as a commodity or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

4. Commitment

The Company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Company does not enter business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

5. Supply Chains

To fulfil its activities, the Company's main supply chains include those related to the installation and maintenance of electricity networks. This includes:

- Suppliers/manufacturers involved in the provision of materials required to construct electricity networks.
- Sub-contractors who provide construction and asset maintenance services.
- All professional services related to electricity network construction and maintenance, including but not limited to regulatory and compliance, legal, financial and tax services
- Recruitment services.

We understand that the Company's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

6. Potential Exposure

The Company considers its main exposure to the risk of slavery and human trafficking to derive from its operation within the UK construction industry which is a sector that is considered to be at higher risk of Modern Slavery.

In general, the Company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

7. Steps

The Company carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Company has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, during the financial year ended 31 March 2026 the Company took the following steps to ensure that modern slavery is not taking place:

- Modern Slavery Policy implemented and reviewed annually.
- New contractors onboarded through the formal onboarding process, which requires adherence with the Modern Slavery Policy.
- Monitoring of business operations to identify Modern Slavery risks and eliminate them where possible, or implement suitable mitigation steps.

8. Key Performance Indicators

The Company has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Company or its supply chains.

- Regular audits on our supply chain.

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- Annual compliance checks on suppliers Modern Slavery practises.

9. Policies

The Company operates several internal policies that operate in conjunction with our Modern Slavery policy ensuring that all business operations are conducted both ethically and transparently, these include:

- **Recruitment & Selection policy** – Including appropriate right to work checks.
- **Staff Code of Conduct** – Identifying our key values and zero tolerance approach to Modern Slavery.
- **Whistle blowing Policy** – Providing staff members a safe place to identify any areas of concern without fear of reprisal.

10. Training

The Company provides the following training to staff to effectively implement its stance on modern slavery:

- Mandatory e-learning training (annually) for all employees.

11. Concerns

The Company will ensure that any concerns raised will be investigated and will then undertake relevant action with regard to the Company's obligations in this regard.

This statement is made under section 54(1) of the Modern Slavery Act 2015, sets out the steps taken under section 54(4), and was approved by the Board of Directors of Aurora Utilities on [date] in accordance with section 54(6). It will be reviewed for each financial year.

Date of Board approval: 27/10/2026

Signed
Simon Reilly,
Director and Chief Executive Officer
Date 27/10/2026

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