
Modern Slavery and Human Trafficking Statement 2026

Contents

1. Introduction	2
2. Report on 2025 Modern Slavery Actions.....	2
3. Organisational structure and supply chains	3
4. Supplier Due Diligence	3
5. Training	4
6. Policies	4
7. Performance Indicators	5
8. Review of this policy	5

Document Control Information
VRE – Modern Slavery and Human Trafficking Statement 2026 – POL – POL 231 – Dec 2025 – REV – V5 - MT

1. Introduction

- a. This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 01 January 2026 to 31 December 2026.
- b. The statement sets down Vantage RE Ltd ("Vantage") commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.
- c. We all have a duty to be alert to risks, however small. We encourage all employees, customers, suppliers and partners to report any suspicion of slavery or human trafficking without fear of retaliation.
- d. Our company ethos encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating on site and managing our supply chain.
- e. We recognise that we must be realistic about modern slavery and trying to eradicate it from our supply chain; it is not an easy "one off" process and that ending slavery in our supply chains is perhaps an unrealistic goal at least in the short to medium term.

2. Report on 2025 Modern Slavery Actions

- a. In 2025, no issues of modern slavery or human trafficking were identified within our business or supply chain.
- b. During the year, we undertook our full Supply Chain Modern Slavery Assessment, reaching out to our material suppliers to gain a comprehensive understanding of our supply chain and ensure that modern slavery risks are being effectively managed. This assessment confirmed that our supply chain remains free from modern slavery risks and that our suppliers are aware of and adhering to our expectations.
- c. Our full Supply Chain Modern Slavery Assessment is conducted on a biennial basis, with the next assessment scheduled for 2027.
- d. The Supplier Due Diligence Process, implemented in January 2024, continues to operate effectively. All new suppliers undergo a Modern Slavery Assessment as part of this process and our Supplier Code of Conduct, which sets expectations regarding modern slavery, ethical business practices, environmental responsibility, and compliance with financial crime regulations, is shared with all material suppliers. The process has been embedded smoothly across our operations, ensuring that our business relationships remain safe, transparent, and compliant with regulatory requirements. Our commitment to influencing our supply chain positively continues to be a core part of our sustainability strategy, and we remain focused on driving ethical practices and transparency throughout all tiers of our supply chain.

3. Organisational structure and supply chains

- a. This Modern Slavery and Human Trafficking Statement covers the business activities of Vantage, which are associated with the acquisition, management, and development of renewable energy generating assets.
- b. Within our current portfolio and the future assets that we seek to acquire, Vantage believe the risk of encountering modern slavery or trafficking through our own operation or those of our suppliers and partners is low.
- c. We recruit talented individuals and pay them fairly and treat them with respect, we also ensure that our suppliers and partners do the same. Our core values of integrity, collaboration, professionalism, forward thinking, and mindfulness set the standard by which we operate.
- d. Vantage currently operates in the United Kingdom and the Republic of Ireland.
- e. Responsibility for Vantage's modern slavery initiatives is as follows:
 - **Policies:** The Chief Business Services Officer is responsible for creating and reviewing policies. The process by which policies are developed is applying best practice and adapting to the needs of Vantage.
 - **Risk assessments:** Managers are responsible for conducting risk assessments in respect of human rights and modern slavery as part of our Supplier Due Diligence Process. Oversight and governance of these risk assessments now fall within the remit of the General Counsel, ensuring consistent application and alignment with our legal and compliance obligations.
 - **Due Diligence:** The procurement function under the Chief Business Services Officer is responsible for reviewing and investigating any known or suspected instances of modern slavery and human trafficking.

4. Supplier Due Diligence

- a. Vantage undertakes due diligence when considering taking on new suppliers or partners, and regularly reviews its existing suppliers and partners, with the next review taking place in 2027.
- b. We make clear our expectations on modern slavery and human trafficking. Our due diligence includes:
 - Assessing risks in the provision of particular services including consideration of health and safety standards, and labour relations; and
 - Requiring improvements where employment practices are falling below expected standards.
- c. On a risk-proportionate basis, Vantage requires Suppliers and Partners to provide declarations and where appropriate, supporting evidence confirming compliance with applicable modern slavery, human rights and employment law standards. This includes confirmation that they:
 - Do not use forced, compulsory, slave or child labour;
 - Comply with applicable employment law and standards in the jurisdictions in which they operate;
 - Maintain fair recruitment, employment and promotion practices;
 - Respect freedom of association and provide mechanisms for employees to raise concerns;
 - Do not withhold wages, require deposits or bonds or retain identify documents; and
 - Have appropriate measures in place to identify, manage and monitor modern slavery risks.

- d. Suppliers and partners will also be required to;
- Regularly report on modern slavery risks, even if the report is zero risks;
 - Undertake any relevant and regular site visits / audits to monitor modern slavery risks;
 - Have established clear and unambiguous processes for reporting and responding to suspected incidents of modern slavery;
 - Have a contingency plan in place to ensure continued safe service delivery if modern slavery risks are identified or cases of modern slavery have been reported.
- e. Vantage will act against suppliers and partners who during the period of their contract fall below the standards expected or who that fail to improve their performance in line with an action plan provided by us. This may include the termination of the business relationship.

5. Training

- a. To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, Vantage requires all staff to complete modern slavery training as part of the induction process. The training includes:
- The definition of modern slavery
 - An explanation of who is most affected
 - Examples of modern slavery
 - The role of business in preventing modern slavery.
 - The signs of slavery and what you should do if you spot them.

6. Policies

- a. Vantage is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This statement affirms Vantage's intention to act ethically in our business relationships. Vantage complies with the UK's Modern Slavery Act 2015, which ensures alignment with all relevant international standards on human rights.
- b. The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:
- **Whistleblowing policy:** Vantage encourages all its workers, customers, and other business partners to report any concerns related to its direct activities or its supply chains.
 - **Vantage Employee Handbook, and Anti-Bribery, Ethics, & Conflict of Interests Policies:** sets down the actions and behaviour expected of employees when representing the Company.
 - **Vantage Sustainability Vision and Strategic Pillars:** This sets down our aspirations and the initiatives that we will be undertaking to effectively implement this vision so that we fully comply with the Europe Sustainability Reporting Standards (ESRS). We will produce our first Sustainability Report in for FY2028 in 2029. In the intervening period we will be contributing to TNB's Environmental, Social and Governance Metrics through our introduction of data collation, interpretation and reporting on such matters.
 - **TNB CSR policy:** Vantage is a wholly owned subsidiary of Tenaga Nasional Berhad (TNB) and TNB's policy on CSR can be found via the following link [Sustainability Report - Tenaga Nasional Berhad \(tnb.com.my\)](https://www.tnb.com.my/sustainability-report)

7. Performance Indicators

- a. The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains.
- Appointing an anti-slavery advocate at management level to help oversee the implementation of this Modern Slavery and Human Trafficking Statement and increase awareness of any actions that need to be taken;
 - Requiring all new suppliers and partners to complete the Vantage Modern Slavery Assessment Tool where the total value of order(s) for the Supply, Works or Services exceeds > £100k and the delivery / completion period is longer than three (3) months, in order to demonstrate all requirements as set out in section 3 above.
 - Undertaking a biennial review of supply chain modern slavery and human trafficking risks, and where relevant amending our procurement policies and practices where they fall below standards required by the UK's Modern Slavery Act 2015;
 - Reviewing, at least every 3 years our People Practices and Policies, and where relevant amending our people policies and practices where they fall below standards required by the UK's Modern Slavery Act 2015. This review will be taking place in FY2026.
 - Requiring all staff to complete annual e-learning refresher training on modern slavery.

8. Review of this policy

- a. This Modern Slavery and Human Trafficking Statement will be reviewed annually from the date of this policy. The latest date that this policy will be reviewed is January 2027.

This policy has been approved & authorised by:

Name:	Fadzlan Rosli
Position:	Interim CEO
Date:	15 January 2026