

Modern Slavery Statement

VPI Holding Limited

Date: 12 June 2023



VPI Holding Limited – Modern slavery statement for financial year ending 31 December 2022

This statement is made pursuant to:

1. in respect of the United Kingdom (**UK**), section 54 of the Modern Slavery Act 2015; and
2. in respect of the Republic of Ireland, the Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013,

and sets out the steps that VPI Holding Limited (**VPI**), together with its subsidiaries, have taken and continue to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. VPI have a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. To date we have had no reports of modern slavery within our organisation or our supply chains.

Our businesses

VPI, through its subsidiaries are involved in the development, construction and operation of natural gas fired combined heat and power (CHP) and natural gas fired power generation assets. Further details of VPI's projects are as follows:

- a) VPI Immingham LLP operates a natural gas fired combined heat and power (CHP) plant near Immingham, on the south bank of the river Humber in North East Lincolnshire, England;
- b) VPI Power Limited operates four efficient, flexible, natural gas fired power generation assets in the UK;
- c) VPI Energy Park A Limited and VPI Immingham B Limited are both seeking to develop and construct gas fired peaking power generation facilities adjacent to the Immingham site in North East Lincolnshire, England; and
- d) Castlelost Flex Gen Limited is seeking to develop and construct a natural gas fired power station in Rochfortbridge, County Westmeath, Ireland.

Our policies

We operate to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including (as applicable) conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Procurement policy. We operate a procurement policy that requires understanding of the primary sources of supply and encourages an in-depth knowledge of the supply chain and associated risks.

Our policies are implemented through a pre-qualification process for suppliers and our standard terms and conditions.

Our suppliers

VPI operates a Pre-Qualification System and maintain a supplier list through our work management software systems Engica and Maximo. We conduct due diligence through the Pre-Qualification System on all suppliers before allowing them to be included in the supplier list. This due diligence includes a search to ensure that a particular organisation has never been convicted of any criminal offences. Our anti-slavery statement forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this statement. VPI has access to Achilles research for supplier assurance.

In addition to the above, as part of our contracts with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations.
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Training

We conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. We undertake the Chartered Institute of Purchasing and Supply (CIPS) module for Ethics and Sustainability annually and work towards MCIPS where appropriate. When MCIPS is achieved we undergo 30 hours of continued professional development to maintain Chartered status in line with best practice.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified
- We have not had to reject or stop utilising any of our suppliers due to modern slavery practices being identified within their organisations

In the next 12 months we will continue to strengthen our approach to managing the risk of modern slavery within our business and incorporating best practice guidance.

Approval for this statement

This statement has been approved by the Boards of Directors of VPI Holding Limited and VPI Power Limited, Castlelost Flex Gen Limited and by the Representatives of the Members of VPI Immingham LLP.



Simon Hale
Director
VPI Holding Limited
Date: 12 June 2023