



# UK Modern Slavery Act Statement

June 2025

Document Owner	Document Approver
General Counsel and Company Secretary	Venterra Group PLC Board of Directors

This statement by the Board of Directors of Venterra Group Plc is made pursuant to Section 54 of the Modern Slavery Act 2015. It outlines the steps Venterra Group has taken during 2024 to prevent modern slavery and human trafficking in our businesses and supply chain.

## Our Commitment

At Venterra Group, we are committed to conducting our business ethically, responsibly, and transparently. We recognize the serious global issue of modern slavery and human trafficking and are dedicated to ensuring that these crimes have no place in our organisation or supply chains. We continue to strengthen our efforts to mitigate modern slavery risks and support the protection of human rights across all our operations.

## Our Business and Structure

Venterra Group exists to help the world's energy transition through wind power. Our vision is to become a global services champion, enabling wind energy to lead the energy transition. We pursue this by acquiring and integrating experienced service providers in the offshore wind industry - our "Member Companies" - to create a collaborative, industry-leading group that supports the engineering, build and support phases of the lifecycle of offshore wind farms.

At Group level, we define how our businesses are expected to operate through our compliance framework. At the heart of this framework is our Code of Ethics and Conduct, which articulates our values, our standard for ethical conduct, our zero-tolerance approach to modern slavery and human trafficking, and the responsibilities of everyone working with or on behalf of Venterra Group.

Each Member Company is required to conform to this framework and operate in a way that upholds our shared standards. As our Group evolves, we continue to embed sustainable governance practices across both Venterra and our Member Companies, ensuring accountability and ethical behaviour throughout our operations and supply chain.

## Policies and Governance

In 2024, part of our Group-level work focused on clarifying and updating the policy commitments, standards, and expectations that underpin our efforts to address modern slavery and human trafficking. These updates reflect our commitment to continuous improvement and help ensure our Member Companies are equipped with practical, consistent guidance.

We updated our **Anti-Slavery and Human Trafficking Policy** to include requirements risk-based due diligence of suppliers and contractors, guidance on identifying potential victims, and instructions for reporting concerns via our whistleblowing hotline or external victim support services.

We also revised our **Code of Ethics and Conduct**, reaffirming and reinforcing our stance against modern slavery and clarify responsibilities for all individuals working with or on behalf of the Group.

To support the practical application of these principles, we updated our **Screening and Due Diligence Procedure** to guide our Member Companies on integrating modern slavery risk assessment into supplier onboarding.

Additionally, we introduced a **Partner Code of Conduct**, which will be implemented across our supply chain, which sets out the standards we expect from those we work with – including respect for human rights and compliance with modern slavery laws.

Reference:	VG-LEG-STA-001	Approved By:	Venterra Group PLC Board of Directors
Version:	4	Issue Date:	27 June 2025

## Due Diligence and Risk Assessment

We have embedded modern slavery risk considerations into our third-party due diligence and broader compliance processes. We take a risk-based approach to modern slavery due diligence, ensuring that resources are focused on the areas of highest risk within our operations and supply chain. This approach is integrated into our compliance framework and includes the following steps:

- Conducting an **annual risk assessment** as part of our Group-wide compliance framework, which help evaluate modern slavery risks across our operations and supply chains.
- Incorporating **modern slavery risk assessments** into supplier and contractor onboarding.

Through this risk-based approach, we focus on continuously identifying and mitigating potential risks related to modern slavery, ensuring that we can remain vigilant and responsive to emerging challenges.

## Training and Awareness

To support the implementation of our policies, we rolled out dedicated modern slavery training in 2024. This training is designed to raise awareness, build capability to identify warning signs, and reinforce reporting channels. It is mandatory for key personnel and reviewed for relevance on a yearly basis.

All staff within the group are required to read and attest to our Code of Ethics and Conduct and Whistleblowing Policy upon joining. Furthermore, all employees are required to do the same whenever major updates are made to these documents. Induction training is provided to all new members of staff in relation to our Code of Ethics and Conduct, Anti-Bribery and Corruption, and Whistleblowing policies

## Reporting and Victim Support

We are committed to creating safe, accessible, and confidential reporting mechanisms for anyone who may witness or experience unethical or unlawful conduct, including potential modern slavery or human rights abuses.

In 2024, we expended access to our **whistleblowing hotline**, making it available not only to our employees but also to third parties – including suppliers, contractors, and business partners. This should help enhance transparency and accountability across our value chain and reinforce our zero-tolerance approach to modern slavery and human trafficking.

Our **employees have a responsibility to speak up** if they are aware of or suspect any form of human rights abuse in our business or those of our partners - and they are empowered to do so. Under our Whistleblowing Policy, employees and others connected to Venterra (such as shareholders, suppliers, and contractors) are encouraged to raise concerns through multiple channels: their line manager, another manager, the HR or Legal and Compliance teams, or via our external whistleblowing services. This service allows for secure and anonymous reporting, ensuring individuals can raise issues without fear.

We do **not tolerate retaliation or victimisation** against anyone who reports a concern in good faith, including potential breaches of our Code of Ethics and Conduct relating to slavery or human trafficking.

We have published a **Victim Support helpline** on our intranet, providing a direct resource for anyone needing access to independent support or assistance.

## Effectiveness and Next Steps

We monitor the effectiveness of our actions through a yearly internal risk assessment, training compliance checks, and regular policy reviews.

We are not aware of any evidence of modern slavery, forced labour, or human trafficking in our operations or supply chain from the time Venterra Group was formed in 2021 through to the date of this statement.

Reference:	VG-LEG-STA-001	Approved By:	Venterra Group PLC Board of Directors
Version:	4	Issue Date:	27 June 2025

Looking ahead, we will continue to strengthen our modern slavery risk assessments, increase engagement with supply chain partners, and improve the accessibility of our resources and reporting tools. Continuous improvement remains at the core of our approach to human rights and ethical business.

---

This statement constitutes the modern slavery and human trafficking statement of Venterra Group PLC and its subsidiaries for the financial year ended 31 December 2024. It has been approved by the Board of Directors.



---

**Ayman Asfari**

**Executive Chairman**

**June 2025**

Reference:	VG-LEG-STA-001	Approved By:	Venterra Group PLC Board of Directors
Version:	4	Issue Date:	27 June 2025