

RED MODERN SLAVERY STATEMENT 2024

For the financial year ending 31 December 2024

OUR COMMITMENT

The Modern Slavery Act 2015 requires certain businesses to set out the steps they have taken and are taking to ensure slavery is not taking place in their operations and supply chain. RED (as part of Tractebel and the ENGIE Group), is fully committed to playing its part in eradicating modern slavery.

In line with this commitment, this statement is being made by RED Group Holdings Limited on behalf of itself and its subsidiaries. In the UK its subsidiary is RED Engineering Design Limited.

WHAT IS MODERN SLAVERY

Modern slavery is an international crime that affects an estimated 40 million people around the world. It includes victims trafficked from overseas and vulnerable people in the UK who are forced to work against their will or are exploited: it transcends age, gender and ethnicity.

RED-OUR BUSINESS ACTIVITY

The RED Group is a specialist engineering design and building services consultancy comprised of specialist building services and ICT engineers. RED has led the drive towards zero carbon engineering solutions for over two decades and its specialist services include MEP, ICT, Sustainability, Health & Safety, Process Engineering Services and Lifecycle Works.

RED stands at the forefront of innovative design, offering energy-efficient data centres and mission-critical facilities. The data centres currently under operations around the world consume significant power, accounting for approximately 2% of global emissions, which is why RED's low-energy and innovative data centre infrastructure designs have earned a global recognition for providing world-class solutions.

RED has around 900 employees and over 800 suppliers and subcontractors globally.

Tractebel is the parent company of RED and is a global engineering and consulting company, with a global presence and vast expertise in sustainable energy and built environment projects, including nuclear, renewables, power & gas, electrical grids, hydropower & dams, water resources & supply, desalination, complex & high-tech buildings, transport infrastructures, and ports & waterways.

OUR RISK ASSESSMENT

To ensure our organisation remains efficient, that our processes are consistent, and our standards maintained, there are a number of corporate support functions based in our UK offices (London, Bicester and Newcastle). These functions exist to ensure that risks are identified and mitigated with strong internal control. The corporate support functions include Legal, Ethics and Compliance, Finance and Corporate Responsibility, HR, Health & Safety, IT and Procurement.

We have assessed our business for the potential for modern slavery to occur within our own workforce and concluded the risk is low. We have adopted robust employment practices for the recruitment and management of our employees, and we closely manage any temporary workers engaged by us through the use of a small number of specialist providers and by undertaking comprehensive due diligence, including right to work checks and background screening.

We have assessed our supply chain for the potential for modern slavery to occur and concluded the risk is low. Our supply chain involves more than 800 suppliers and subcontractors, with over 600 based in the UK. In line with the nature of our business activities, the competencies of our supply chain are extremely good, providing highly skilled, high-quality, professional services to help RED deliver innovative and best in class solutions.

OUR POLICIES, PRACTICES & COMMITMENTS

The ENGIE Group's Ethics Code of Conduct, applicable to all its entities, specifies the Group's ethical commitments and requirements for all employees. These commitments include respect for human rights and, in particular, the prohibition of forced labour and child labour. The Code explicitly states this principle is to be respected equally by all its stakeholders. RED ensures its supply chain respects this principle through i) the incorporation of the Code's requirements as a contractual obligation in RED's standard terms and conditions to which all of its sub-consultants adhere and ii) the implementation of RED's Supplier Code of Conduct, see further below.

The ENGIE Group exercises vigilance towards Human Rights through its Duty of Vigilance Policy and the adoption of a Vigilance Plan which defines its commitments to:

1. respect internationally recognised human rights;
2. respect workers' rights;
3. exercise vigilance over the practices of its suppliers and subcontractors;
4. carry out risk analyses;
5. make available and deploy training and awareness-raising modules to all employees;
6. maintain grievance mechanisms at entity and Group level for anyone affected by the Group's activities. ENGIE maintains a comprehensive and independent whistleblowing system. No forced labour violations were reported through the whistleblowing system in 2024.
7. monitor the implementation of these measures. No issues relating to forced labour were identified through the annual risk assessment exercise, internal control processes or internal audits carried out in 2024.

RED'S ETHICS CODE OF CONDUCT

RED has adopted the ENGIE Group Ethics Code of Conduct as the foundation for its ethics and compliance programme and which requires every employee to promote and act in full compliance with all applicable laws and the Group's values and ethical principles.

RED's ethical standards are based on 5 fundamental principles set out in the Code of Conduct:

- Corruption and fraud are strictly prohibited.
- Human rights must be respected.
- Environmental protection is a commitment that binds us.
- Laws and regulations apply to each of us.
- Integrity and loyalty guide our relationships with third parties.

RED'S SUPPLIER CODE OF CONDUCT- RESPONSIBLE PROCUREMENT

RED considers its corporate suppliers and suppliers of services (it's supply chain) to be key stakeholders in RED's business. The RED Supplier Code of Conduct incorporates the ENGIE Group Procurement Referential and Code of Conduct in Supplier Relations, and in particular requirements in terms of Human Rights (including the prevention of modern slavery), Health and Safety and Ethics and Compliance.

RED's suppliers of services must complete a supplier questionnaire (the responses to which are fully reviewed) and agree to adhere to the RED Supplier Code of Conduct in order to be able to contract with RED and provide services. RED's suppliers are re-onboarded annually. RED carries out comprehensive due diligence against all of its suppliers annually, comprising ethical, financial and corporate structure and beneficial ownership checks. If suppliers cannot complete the supplier questionnaire, do not agree to adhere to the obligations contained in the RED Supplier Code of Conduct or have not been utilised in the previous 12 months they are offboarded.

Further, RED's standard sub-consultancy agreement includes the ENGIE Group ethical, environmental and social responsibility clause, (including the obligation to adhere to the Group's Human Rights commitments).

OUR TRAINING

All of our employees and external (temporary) workers are required to undertake mandatory ethics training, which includes a bespoke module entitled "Human Rights at ENGIE".

All employees are bound, by virtue of their terms of employment and by RED's Ethics Code of Conduct.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for ENGIE Supply Holding UK Limited (on behalf of itself and its subsidiaries) for the financial year ending 31 December 2024.

Thierry Kalfon
Chief Executive Officer, RED
Date: June 2025



RED

A company of **TRACTEBEL**
