

RED MODERN SLAVERY STATEMENT 2025

For the financial year ending 31 December 2025

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 50 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 Commissioning works.

RED stands at the forefront of innovative and sustainable design, delivering energy-efficient data centres and mission-critical facilities that help address the industry's significant power consumption, estimated at 1-3% of global emissions. By applying environmentally conscious engineering practices and advanced technologies, RED creates low-energy infrastructure that optimises performance while reducing environmental impact. Recognised globally for its world-class solutions, RED is a leading provider of sustainable engineering for the data centre sector, supported by around 1,000 employees and a network of more than 950 suppliers and sub-consultants worldwide.

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 Social Responsibility, HR, Health & Safety, IT and Business Operations.

We recognise that modern slavery and human trafficking can occur in any workforce, and we remain vigilant to these risks within our own operations. We have adopted robust employment practices for the recruitment and management of our employees, ensuring clear standards, transparency, and oversight throughout the employment lifecycle. We also closely manage any temporary workers engaged by us through a small number of specialist providers, and we undertake comprehensive due-diligence, including right-to-work checks and background screening, to help prevent any form of exploitation. These measures support our commitment to maintaining a safe, ethical, and legally compliant working environment.

We acknowledge that modern slavery and human trafficking have the potential to occur in any supply chain, and we remain alert to the potential risks this poses within our own. Our supply chain comprises of nearly 1,000 suppliers, including over 750 based in the UK. The competencies of our supply chain are extremely good, providing highly skilled, high-quality professional services that support RED in delivering innovative and best-in-class solutions. However, we acknowledge that even suppliers offering specialist professional services are not entirely immune from the risks of exploitation. Consequently, we actively monitor our supplier relationships, conduct proportionate due-diligence, and implement measures designed to identify, prevent, and address any indicators of modern slavery.

RED'S SUPPLIER CODE OF CONDUCT - RESPONSIBLE PROCUREMENT

RED considers its corporate suppliers and suppliers of services (its supply chain) to be key stakeholders in RED's business. This Supplier Code of Conduct ('Code') sets out the minimum standards of behaviour that RED Group and all associated entities (RED) expects its suppliers to meet in the areas of corporate social responsibility, legal & ethics, data privacy & security, health & safety and environment & energy. The Code 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 applies a structured and risk-based approach to the onboarding and ongoing management of its suppliers and sub-consultants. All suppliers must complete a Supplier Questionnaire and agree to the RED Supplier Code of Conduct before engagement. Onboarding includes compliance checks such as credit, ethics, and reference verifications, and supplier data is recorded in RED's systems.

Ongoing maintenance involves annual re-evaluation, including performance assessments, financial and ethical due diligence, and validation of corporate structure and beneficial ownership. Sub-consultants are also subject to performance evaluations to ensure alignment with RED's standards and contractual expectations. This process ensures RED maintains a compliant, ethical, and high-performing supply

base in line with its operational and risk management objectives. 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 2025.

Thierry Kalfon
Chief Executive Officer, RED
Date: March 2026

