

Anti Slavery and Human Trafficing Statement



This statement is pursuant to the Modern Slavery Act 2015 and relates to actions and activities during the financial year 2024 [1st January 2024 to 31st December 2024]

Commitment

Xodus is committed to preventing modern slavery and human trafficking across all aspects of our operations and supply chain.

We aim to uphold the highest standards of ethical conduct and integrity in all our business relationships. To support this commitment, we implement and enforce robust systems and controls designed to ensure that slavery and human trafficking do not occur anywhere within our supply chain or corporate activities.

Relevant Information About Xodus

Xodus is a global Energy Consultancy with over 400 technical experts delivering leading services and products to help our Clients address challenges across all stages of an Energy development. With expertise across oil and gas, offshore wind, hydrogen and carbon capture, utilisation and storage, we are at the forefront in enabling the Oil and Gas Industry to transition to Net Zero. We have the skills and experience to identify opportunities to decarbonise existing assets whilst optimising performance, and the knowledge and creative thinking to explore ways to integrate New Energies.

From Appraise and Select development stages through design, commissioning, operation and decommissioning, our integrated teams have helped clients identify and develop optimum solutions to maximise return on investment over the asset lifetime. More details about our business can be found at: <https://www.xodusgroup.com/this-is-what-we-do/>

As part of the energy industries worldwide Xodus recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Geographies

Xodus Group currently operates across the globe. We have established a presence across the United Kingdom, the Middle East, Australia and the United States. More details can be found at: <https://www.xodusgroup.com/this-is-where-we-are/>

Scope of provided business activities in all countries is assessed as low risk in relation to slavery and human trafficking.

Employees and Other Staff

As at 31 December 2024, the number of personnel, including direct employees, agency and contract staff working for Xodus was:

Direct Employees: 473



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Contractor/Associate/Other: 115

Supply Chain

Xodus continues to operate with a strategic intent to limit exposure to supply chain and contractor dependencies for service provision.

During 2024 there was a focus on not only maintaining the changes implemented in 2023 but also progressing further improvements to reflect our ongoing commitment to responsible sourcing, ethical business practices and continuous improvement in supply chain resilience.

The two main focus areas were:

- Designing and planning the implementation of a new supplier risk rating system to better assess and monitor supplier risk profiles.
- Testing a new purchasing approval system to streamline procurement workflows, improve transparency and enhance supplier engagement.

All suppliers are contractually bound to uphold Xodus' values and business ethics, including commitments to anti-corruption and human rights, safety, quality, and environmental standards. Suppliers are also required to ensure their own supply chains adhere to these same principles. Non-compliance with our business ethics and values will result in termination of contract.

Relevant Policies and Procedures

Xodus Group operates the following policies and procedures that aid the identification of the modern slavery risks and human trafficking in its operations:

Code of Conduct

The Xodus Code of Conduct (the Code) is applicable to all personnel working for and on behalf of Xodus globally, including direct employees, agency and contract staff. The Code sets out our commitment to conducting business fairly and ethically, including by treating our employees, clients, contractors and suppliers fairly and with respect. It also provides guidance on how to ensure we uphold our commitments.

All Xodus direct employees are required to take an e-learning module on the Code of Conduct on joining the business.

Code of Conduct for Suppliers

The Xodus Code of Conduct for Suppliers is incorporated into our standard terms and conditions for suppliers. It includes mutual commitments to:

- Ethical business conduct, including with regard to anti-corruption.
- Health, safety and security.
- Human rights and fair and lawful employment practices across Xodus and throughout our supply chain.
- As a minimum, complying with national legal requirements regarding wages and working hours.
- Support the International Labour Organisation's standards regarding child labour and minimum age.
- Prevent modern slavery and human trafficking anywhere in our business or supply chain.





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- Uphold the same standards when dealing with employees, contract staff and sub- contractors.

Communication, Education and Training

Xodus undertakes annual training for all personnel to ensure that the Xodus Code of Conduct is fully understood and properly applied, and that staff understand and help to uphold company commitment to doing business ethically and with integrity, including with regard to its human rights commitments. The training is overseen by the Compliance Manager and delivered by interactive e-learning.

Speak Up Channels and Culture; and Grievance Procedures

We have a clear Speak Up Policy, which is summarised in the Code of Conduct and explained in fuller detail in a separate policy. It offers various channels for raising concerns, including an externally administered and monitored confidential reporting line (Safecall). All personnel are encouraged to utilise one of these reporting channels if they become aware of a possible breach of our Code of Conduct or have concerns in respect of unethical conduct, including human rights breaches.

If individuals working for us (whether as employees or contract staff) have a grievance about unfair labour practices, they are encouraged to use local grievance procedures, which are widely communicated and available to all our staff.

Approval and Updates

This statement has been approved by the Xodus Leadership Team, who will review and update it annually.

Stephen Swindell

Chief Executive Officer

