

Modern Slavery and Human Trafficking Statement



This statement is pursuant to the Modern Slavery Act 2015 and relates to actions and activities during the financial year 2025 [1st January 2025 to 31st December 2025]

Commitment

Xodus has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically, transparently, and with integrity in all our business relationships and to implementing effective systems and controls to reduce the risk of modern slavery occurring within our operations or supply chain.

Relevant Information About Xodus

Xodus is a global energy consultancy employing over 590 personnel¹, including more than 440 direct employees and a network of specialist contractors and associates. We provide technical consultancy services across the energy sector, supporting clients throughout the lifecycle of energy projects, from early-stage appraisal and development through design, commissioning, operation and decommissioning.

Our expertise spans oil and gas, offshore wind, hydrogen, and carbon capture, utilisation and storage (CCUS). As the energy sector evolves, we support clients in improving the performance and sustainability of existing assets while helping to develop and implement lower-carbon energy solutions.

Xodus operates across the United Kingdom, North America, Australia and the Middle East, delivering services to clients worldwide. Further information about our business, services and locations can be found at www.xodusgroup.com.

As a responsible employer and business partner operating within the global energy industry, Xodus recognises its responsibility to respect and uphold human rights and to take effective measures to prevent modern slavery and human trafficking in its operations and supply chain. We are committed to maintaining ethical business practices and fostering a culture of integrity, transparency and accountability across all areas of our business.

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/>

While Xodus assesses the risk of modern slavery occurring within its direct operations as low, we recognise that risks may arise within global supply chains, particularly where suppliers operate across multiple jurisdictions. Accordingly, we maintain proportionate due diligence and supplier assessment processes to identify and manage potential risks.

¹ Data for December 2025





Modern Slavery and Human Trafficking Statement

Due Dilligence

Xodus undertakes proportionate due diligence in relation to suppliers, contractors, and other business partners. During 2025, supplier onboarding and procurement processes incorporated risk-based assessments designed to identify potential ethical, legal, and operational risks, including those related to modern slavery and human trafficking. Suppliers identified as presenting elevated risk may be subject to enhanced review and monitoring.

Supply Chain

During 2025, Xodus embedded and implemented key supply chain improvements that strengthened responsible sourcing, ethical business practices, and supply chain resilience. This included the rollout of a supplier risk rating system to improve supplier risk assessment and monitoring, and the deployment of a purchasing approval system to streamline procurement processes, enhance transparency, and strengthen governance. The supplier risk rating system incorporates consideration of supplier location, service type, and other relevant factors to support a proportionate risk-based approach to supplier management.

Our primary focus for 2026 is the further enhancement of the supplier risk management system to ensure it adequately reflects the risks and opportunities associated with emerging and new market areas that Xodus is exploring. This will support the continued development of a resilient, sustainable, and adaptable supply chain capable of supporting future business growth.

All suppliers are contractually required to uphold Xodus' values and business ethics, including commitments relating to anti-corruption, human rights, health and safety, quality, and environmental standards. Suppliers must also ensure that these principles are reflected throughout their own supply chains. Failure to comply with these requirements may result in contract termination.

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





Modern Slavery and Human Trafficking Statement

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

Communication, Education and Training

Annual compliance training includes content covering the Code of Conduct, human rights, ethical business practices, speaking up, and the identification and reporting of modern slavery indicators. Training completion is monitored and reviewed by the Compliance Manager.

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.

Measuring Effectiveness

Xodus monitors the effectiveness of its modern slavery controls through:

- Completion rates for Code of Conduct training
- Monitoring of Speak Up reports and grievance mechanisms
- Supplier risk assessment and review activities
- Periodic review of procurement and supplier management processes

During the reporting period, no substantiated incidents of modern slavery or human trafficking were identified within Xodus operations.

Approval and Updates

This statement was reviewed and approved by the Xodus Leadership Team and signed by the Chief Executive Officer on behalf of Xodus. The statement will be reviewed annually to ensure its continued effectiveness and relevance.

Stuart Holley

Chief Executive Officer

