



Anti-Slavery and Human Trafficking/Modern Slavery **Statement**

IMS-MSS-001

2026

Purpose

This statement sets out our commitment to preventing modern slavery and supporting ethical business practices in accordance with the UK Modern Slavery Act 2015.

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. This disturbing issue transcends age, gender and ethnicity.

Our Commitment

We, ENSMART POWER LTD (as part of the ENSMART POWER Group), are fully committed to conducting business with honesty, integrity and respect for human rights. We have a zero-tolerance approach to modern slavery, forced labour, servitude and human trafficking in all areas of our business and supply chain.

ENSMART POWER is committed to:

- acting ethically and with integrity in all business relationships;
- complying with the UK Modern Slavery Act 2015 and other applicable legislation;
- preventing modern slavery and human trafficking within our business and supply chain;
- promoting fair, lawful and safe working conditions;
- encouraging transparency throughout our supply chain;
- investigating any concerns promptly and appropriately; and
- continually improving our approach through our Integrated Management System (IMS).

Our UK business activity

Within the UK ENSMART POWER is one of the leading providers of energy storage systems and a global specialist in the design and manufacture of uninterruptible power supplies (UPS) and power conversion systems. Our solutions enable homes, businesses, and utilities to unlock smarter, cleaner, and more cost-effective energy across the UK and worldwide..

ENSMART POWER operates in the Energy and Power Solutions sector, specifically within:

- Energy Storage Systems (ESS) – residential, commercial, industrial, and utility-scale applications
- Critical Power & Power Continuity Solutions – Uninterruptible Power Supplies (UPS) for data centres, healthcare, industrial facilities, and critical infrastructure
- Power Electronics & Power Conversion Systems – including frequency converters and voltage stabilisation solutions
- Smart Energy & Power Management Solutions – integrating hardware with intelligent monitoring and control software

We are committed to delivering reliable, innovative energy storage and power continuity solutions for homes, businesses, and utilities in the UK and worldwide, enabling smarter, cleaner, and more cost-effective energy use.

In support of our company mission and vision, to ensure our organization achieves its goals we maintain the highest standards of **quality, environmental responsibility, and occupational health and safety** in the design, manufacture, supply, installation, and servicing of our power solutions.

Our Supply Chain

Our supply chain includes manufacturers, component suppliers, logistics providers, subcontractors, professional service providers and installation partners. The majority of our supply chain is based in the UK and Europe.

We recognise that supply chains can present varying levels of modern slavery risk and are committed to working only with organisations that demonstrate ethical business practices and respect for internationally recognised human rights.

Having assessed our supply chain for the potential for the risk of modern slavery, we have identified a number of categories of services provided to us by our supply chain where we consider that there is a higher risk of modern slavery or human trafficking occurring.

We have focussed our attention on these areas which are:

- Cleaning contractors • Catering services • Manned guarding/security • Construction workers (low and unskilled) • Agency workers • Waste management • Pest control • Grounds maintenance

Our Policies & Practices in Relation to Modern Slavery

Our commitment to ethical business practices is supported by our Code of Business Ethics that requires every employee to take seriously their role in building and protecting our reputation, by acting in full compliance with the applicable laws and our values and ethical principles, in all our activities.

Our ethical principles are:

1. Zero tolerance for unethical behaviour including harassment, corruption and fraud
2. Act in accordance with laws and regulations
3. Behave honestly and promote a culture of integrity and loyalty
4. Commit to protecting the environment
5. Respect others and human rights

Alongside the Ethics Code of Conduct, we have in place a set of policies, processes and procedures which seek to ensure that slavery and human trafficking is not taking place in our supply chain or our operations. These include:

- Code of Business Ethics
- Anti-Bribery & Corruption Policy
- Whistleblowing Policy
- Sustainable Procurement Policy
- Supplier Approval and Evaluation Procedures

These documents establish the standards expected of our employees, contractors and business partners.

Our Due Diligence Process

In our own operations

Our people are subject to various appropriate pre-screening checks during recruitment. This includes right to work checks pre-employment and throughout employment for those individuals whose right to work is not permanent. Our contractual relationship with these suppliers of temporary labour also requires them to undertake robust onboarding checks before an individual will be engaged.

Our risk assessment has determined that our workers present a lower risk of modern slavery and, so while these workers will only be sourced through agencies who have agreed to our preferred supplier contractual terms, there is no requirement for those suppliers to undertake a biannual audit on those workers.

In our supply chain

Prior to their engagement, new suppliers are required to complete our supplier questionnaire and/or adhere to modern slavery contractual requirements. Responses to the supplier questionnaire are subject to a desktop audit which is conducted jointly by staff from our Procurement, Finance and Health and Safety teams. During the onboarding process, these suppliers are required to confirm that they can, and will, adhere to the commitments presented in the ENSMART POWER Ethics Code of Conduct.

Our Training

Our staff are all required to undertake mandatory ethics training, which includes a bespoke module entitled “Human Rights at ENSMART POWER” so that they know how to identify exploitation and modern slavery and how to report suspected cases.

All employees are bound, by virtue of their terms of employment, and by our policies, charters and codes of conduct including our Ethics Code of Conduct.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company’s slavery and human trafficking statement . This statement was *approved by the Board of Directors of ENSMART POWER LTD on 19th January 2026* and will be reviewed annually.

Signed:



Deniz Keskin
Managing Director

Date: 19th January 2025
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