



**BOSTON
ENERGY**
Wind Power Services

Modern Slavery Policy Statement

Date Published: 3rd March 2026

Modern Slavery Policy Statement

Policy Statement

This statement sets out Boston Energy's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chain.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

About Boston Energy

Boston Energy is a leading service provider in wind energy, supporting major wind turbine manufacturers and developers with building, installing and maintaining their wind turbines.

In 2025 we operated in the following countries:

- United Kingdom
- Denmark
- Netherlands
- Germany
- Poland

Supply Chain

We undertake due diligence when considering taking on new suppliers and regularly reviews our existing suppliers. Our due diligence approach includes:

- mapping the supply chain to assess product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier;
- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;

We have reviewed our key performance indicators (KPIs). As a result, we are;

- developing a system for supply chain verification expected to be in place by end 2026 whereby we evaluate potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be completed by end 2026 whereby we evaluate all existing suppliers.

Modern Slavery Policy Statement

1. Our People

We have company policies in place that set out the standards and behaviours that we expect from our people and the way in which we want to do business which support our stance on anti-slavery. These include, but are not limited to:

Recruitment policy - We have a robust onboarding process ensuring that all new starters complete a new starter checklist, right to work documentation is obtained and verified, bank accounts are verified and all colleagues are inducted. Each new starter understands the risk of modern slavery through our business conduct guidelines. We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we are using before accepting workers from that agency.

Whistleblowing Policy - We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chain of our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our speaking up page on our website.

Business Conduct Guidelines - Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

2. Training

We require our People Team to complete training on modern slavery and line managers receive the appropriate training. Our modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within our organisation;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative;

Modern Slavery Policy Statement

- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps our organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from our supply chains.

3. Awareness

We provide regular general awareness to our employees via Teams and email covering:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- what external help is available, for example through the Modern Slavery Helpline.

4. Compliance

We monitor compliance to our company policies and legal obligations as part of our internal audit program and training completion reports.

Approval

This statement covers the period from 1 January 2025 to 31 December 2025 and has been approved by the Board of Directors.

Signature: 

Name: Julian Cattermole

Position: Boston Energy CEO

Date: 3rd March 2026