

Modern Slavery Act 2015

Modern Slavery Statement 2025

Moray Offshore Windfarm (East) Ltd. (“MOWEL”)

operating company

Registered in England & Wales company no: 07101438

Registered office:

Shepherd and Wedderburn LLP, Octagon Point,
5 Cheapside, London, England, EC2V 6AA

Moray East Holdings Ltd. (“MEHL”)

holding company

Registered in England & Wales company no: 10779261

Registered office:

Shepherd and Wedderburn LLP, Octagon Point,
5 Cheapside, London, England, EC2V 6AA

together the “Companies” or “Moray East”

Moray East Offshore Windfarm is a 950MW transmission network connected renewable generation asset, located approximately 22 km off the northern coast of Aberdeenshire, occupying an area of 296km², owned by the Companies. The Companies are committed to uphold statutory compliance under the Modern Slavery Act 2015 and ensure the obligations and requirements are adopted at all levels of the organisation.

1. Organisation & Supply Chain

The windfarm is owned by a joint venture consortium of, Moray Offshore Renewable Power Ltd (MORPL), Delphis Holdings Ltd., Diamond Green Ltd. (a consortium of Japanese companies) & Equitix Anemoi Bidco Ltd. The majority (c. 87%) of its operational spend, goods and services are sourced from United Kingdom, with the remaining services procured from Europe. The Companies currently engage a small management team of secondees provided by the Joint Venture shareholders, accountable to maintaining compliance with modern slavery objectives. The main source of resource and goods relate to three main operations contract scopes. The asset management of the windfarm is performed by Ocean Winds UK Ltd., a related company of the JV shareholders MORPL & Delphis Holdings Ltd, located in Edinburgh. The wind turbine service and maintenance scopes are performed by the OEM, Vestas Offshore Wind UK Ltd, a subsidiary of the largest global wind turbine manufacturer, a Danish Company with established UK service division. Balance of plant inspection and maintenance is conducted by a variety of UK & European contractors.

2. Applicable Policies

The project employs a Code of Ethics policy which defines legislative compliance and the project’s zero tolerance approach towards modern slavery and human trafficking. Policies are reviewed regularly and approved by the Board of Directors. The project adopts Ocean Winds’ procurement, due diligence, code of conduct and compliance procedures whilst performing procurement due diligence, quality assurance and audit checks to ensure standards are being maintained. All direct workers for the Companies are secondees provided and vetted by the supplying shareholder.

3. Due Diligence

As the vast majority of services and resources are subcontracted by Moray East, the procurement process is a fundamental part of ensuring effective, compliant delivery. Ocean Winds UK, as operator, are responsible for conducting procurement activities in line with agreed procedure. This consists of risk-based supplier screening, supplier self-assessment and audits & verification. All Moray East contracts are governed by English law and include specific obligations requiring compliance with the UK Modern Slavery Act 2015 and the principles of the UN Global Compact. Our Code of Ethics, which outlines our expectations on ethical business practices, including labour rights and human rights which serves as a key reference point for aligning supplier

behaviours, is shared with all suppliers prior to contracting. Moray East has a designated Compliance Partner who is appointed as a point of contact for any concerns relating to non-compliance, supporting transparent and accountable supply chain relationships. The process of notification and remediation is captured in the policy document. No incidents of modern slavery have been discovered since the start of operations.

4. Risk Assessment


Moray East holds a modern slavery risk assessment within its enterprise risk management system. All risks are reviewed quarterly, and the modern slavery risk assessment is reevaluated annually, as part of wider risk management governance. Ocean Winds UK is responsible for managing the system and, whilst individuals are assigned to each risk, have appointed a dedicated risk manager to oversee the process. Desk based research, procurement due diligence, audit & proactive engagement inform the annual review of the risk item. It is expected that the Companies' highest exposure modern slavery risk is in relation to marine labour and subcomponent manufacturing.

5. Monitoring, Evaluation & Continuous Improvement

Moray East sets key performance targets & self-assessment objectives at the start of each calendar year. The Executive General Manager is responsible for setting and driving these targets. Lagging indicators, such as non-compliance events are recorded, whereas leading indicators, such as number of adherence audits to procurement procedures are proactively tracked and reviewed. At the end of each year, the project performs an annual review of all elements of business, to be able to include improvements in future years, including its approach towards its modern slavery obligations.

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and constitutes the Companies anti-slavery and human trafficking statement for the financial year ending 31st December 2024.

This statement was approved by the Directors of the Companies,

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Adam Morrison

Chairman of the Board of Directors

Date: 11-May-2026