



# Modern Slavery and Human Trafficking Statement

February 2025

drax

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## Introduction and statement approval

### Dwight Daniel Willard Gardiner (known as Will Gardiner) CEO, Drax Group plc

As a purpose-led organisation that’s aiming to grow, we anticipate a related growth in the positive outcomes we deliver for climate, nature and people. For the climate, we believe we can reduce and remove more atmospheric carbon. For nature, our operations can help sustain more working forests and have a positive impact on biodiversity. And for people, we can provide more jobs and opportunities in the communities where we operate, and throughout our supply chain.

In this, our ninth Modern Slavery Statement, we outline the progress we’ve made on our Supply Chain Human Rights (‘SCHR’) programme in 2024 and describe our focus for further action in 2025. Our SCHR programme concentrates on identifying the risk of human rights abuses within our own business and the wider supply chain. It also considers modern slavery, as well as the potential for wider abuses and

welfare matters.

Modern slavery is an abhorrent crime, and we recognise our responsibility in promoting respect for human rights and the dignity and respect which every person should receive. Our commitment is embedded within our governance and our values. Our values underpin our purpose and strategy and together they define our culture - they have an impact on everything we do.

Over the last 12 months, much of our focus has been on developing a new Sustainability Framework (which sets out specific KPIs for our climate, nature and people positive pillars). We have developed the Sustainability Framework in conjunction with internal and external stakeholders, including shareholders. This collaboration recognises the importance of a wider range of views in the development of our broader targets, and supports the long-term success of the business. The Framework also helps to improve our supplier data, enhance our ethical due diligence process and progress a programme of ethical audits. Improving our supply chain transparency is an important step in driving positive change.

While we have made good progress, we also recognise the opportunity to do more and have set that as an objective for 2025. We will also continue to collaborate with our supply chain to promote fundamental human and labour rights (including those covered by the UN Global Compact and the UN Declaration on the Rights of Indigenous People).

We are making this Statement for the financial year ended December 2024, in accordance with the requirements of Section 54, part 6, of the UK Modern Slavery Act 2015 and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act. This Statement applies to all companies within Drax Group plc (‘Drax’) that are required to publish a statement. The Board has reviewed and approved this statement. I signed it on behalf of the Board of Directors of Drax Group plc, following its approval on 25 February 2025.

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed in the Statement Scope section below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects, for the reporting year and that I have the authority to bind Drax Group plc.

Date: 25 February 2025

Will Gardiner, CEO, Drax Group plc

## A summary of our progress in 2024

### Governance:

- Carried out a multi-stakeholder review of our Codes of Conduct, which were also informed by a number of third-party ethical audits
- Provided quarterly reporting to the Ethics and Business Conduct Committee (EBCC) on the activities of the SCHR programme and Working Group
- Made progress in the development of our Sustainability Framework, outlining commitments to Climate, Nature and People

### Risk Assessment:

- Finalised Slave Free Alliance's (anti-slavery charity) gap analysis of our SCHR Programme
- Incorporated the outputs of the Gap Analysis into the SCHR Working Group ('SCHRWG') workplan, with activity already underway on approximately two thirds of the identified opportunities
- Continued to map our high-risk supply chains

### Ethical Due Diligence (EDD):

- Progressed several enhancements to our EDD processes, such as further strengthening our suppliers' Self-Assessment Questionnaires (to incorporate more key data points relating to modern slavery)
- Worked towards improved supplier data/categorisation across various Drax systems, which will improve the effectiveness of our risk assessments

### Ethical Auditing:

- Worked with third party ethical auditing experts to develop a bespoke ethical audit based on our Supplier Code of Conduct.
- Launched a programme of ethical audits, conducted on five key suppliers operating in high-risk industries (from a human rights perspective)

### Training and Awareness:

- Developed a new Modern Slavery training module and deployed it to all teams considered to be 'at higher risk' of encountering potential SCHR issues, due to the nature of their work
- Delivered multiple face-to-face Business Ethics 'roadshows' across the year, including at our Alabama, Ipswich, London, Prince George, Selby and Vancouver sites
- Through a partnership with ethical consultants Align, held a webinar (accessible to all Group colleagues) that included a guest speaker from the Centre of Social Justice and a survivor of Modern Slavery who shared their first-hand experience of labour exploitation and debt bondage

### Procurement:

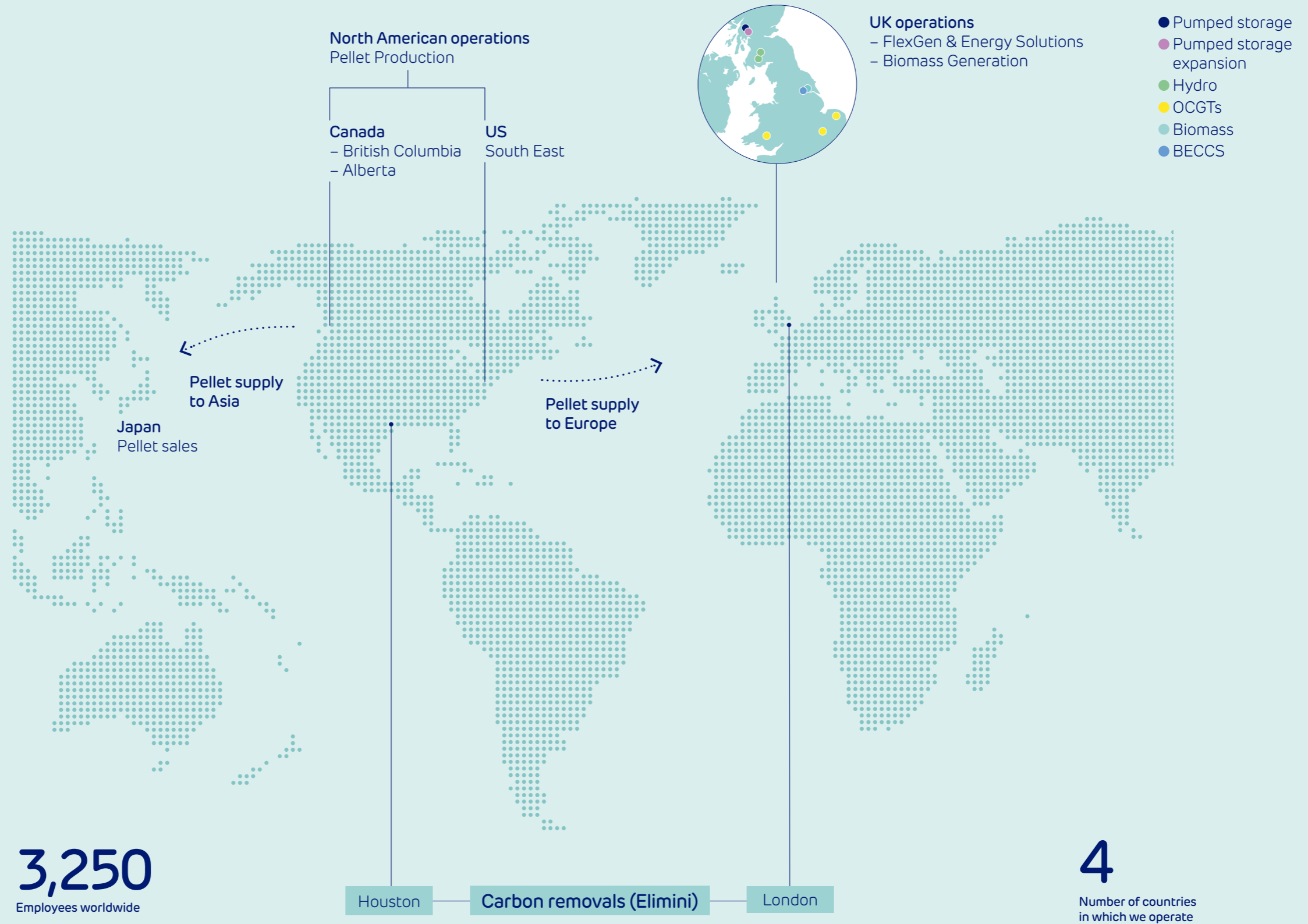
- Introduced a UK Supplier Maintenance App, improving data capture quality and due diligence signposting
- Developed a Global Management Framework to manage supplier performance and risk

### Indigenous Peoples:

- Established the Indigenous Advisory Committee (IAC) of community leaders, to provide guidance, insight and cultural perspectives to Drax in matters relating to Indigenous People/s relations, community engagement and social responsibility
- Developed Drax Reconciliation Action Plan, detailing our 17 commitments to building respectful and meaningful relationships with Indigenous communities. These commitments span across four pillars: Leadership Commitment, Employment, Business Development and Community relations.



# Where we operate



## Our people

### People Positive

We aim to be a responsible business partner and neighbour in the supply chains and communities in which we operate, conducting our business with honesty, integrity, and respect. We engage with stakeholders in our efforts to provide a positive impact for the workers and communities linked to our operations. Our People Positive strategy encompasses colleagues' experiences at Drax, including the systems we use, and our policies, values, and culture. More details about this strategy can be found in our 2024 Annual Report, available at [www.drax.com](http://www.drax.com).

In the UK, we pay our colleagues the equivalent of the real Living Wage (RLW) applicable to their role (as a minimum).

We are focused on ensuring fair, consistent and transparent talent processes for all colleagues. In 2024, we launched the Fair Hiring project, with this purpose. The project outputs include hiring manager training and toolkits, improved digital assessments, and specific interventions aligned to under-represented talent identified in our data. We believe this approach can further enhance the representation of colleagues from the communities in which we operate.

Our management teams regularly review local health, safety and environmental (HSE) performance and consider progress against key performance indicators and lessons learnt, based on colleague feedback. Each quarter, the Group HSE Committee undertakes an HSE performance review. The Executive Committee reviews the findings, and the CEO reports on HSE matters at each Board meeting.

In 2023, we improved our dashboards on our Group HSE reporting platform. These help us to assess trends and inform areas for action, allowing us to undertake analysis of incidents, corrective actions, hazard management, risk management and behavioural observations. At the start of 2024, we updated the Group HSE Dashboard to make it more user-friendly and efficient. It was also added to the Drax intranet; accessible to all colleagues.

In 2024, we launched our Culture, Values and Employer Value Proposition (EVP) programme, to align with and support our overarching enterprise growth strategy. Through our new Values, EVP and Colleague Experience framework, this initiative aims to create a more cohesive and inclusive workplace culture, improve engagement and performance and enhance our attractiveness as an employer.



### Workforce metrics

- Average age 40.79
- % of non-UK 32.55%
- % of UK 67.45%
- % of female 28.58%
- Engagement score 7.4 (out of 10) - this measures employees' commitment to, and enthusiasm about, their work and the organisation



**Our recruitment processes:** We have provisions within our recruitment procedures designed to address the risks of modern slavery. These steps include:

- Carrying out “right to work” checks and requiring that the agencies we use to supply non-permanent workers carry out equivalent checks. Through our ethical audits, we have also started to test suppliers’ processes in this space.
- Completing pre-employment checks to verify the identity of prospective colleagues and that they’re over 16 years of age.
- Making sure that an employment contract, offer letter in the US, or other local equivalent is in place before an individual starts their employment with Drax.
- For our suppliers in the UK, who contract staff to work for or on behalf of Drax for two or more hours a week, for eight consecutive weeks a year, we encourage them to pay the RLW

We respect the rights of our colleagues to freedom of association and collective bargaining. Approximately 16% of our UK workforce is covered by a collective bargaining agreement, 4% in Canada and currently no colleagues in the US. We maintain regular dialogue with trade union representatives and hold bi-monthly meetings to discuss matters of interest to union members, as well as the wider workforce. These exchanges may concern safety or managing change in our operations, and there’s an annual discussion about remuneration. We carry out annual pay bargaining negotiations for those colleagues covered by that within their collective agreement.

We maintain regular dialogue through various workforce engagement activities. The Board believes our workforce forums - My Voice Forums (Forums) - are the most appropriate means to facilitate colleague engagement and to foster direct engagement between the Board and the workforce. The Forums are a key part of our listening strategy, providing further insight to colleague feedback. To support the Forums, a member of the senior leadership team and an HR representative attend each meeting. The Forum chairs then meet with the Chair and CEO in a safe environment where colleagues are able to speak openly and candidly, share sentiments, and ask direct questions of the Chair and CEO.

In 2024, our My Voice Surveys became quarterly, providing more regular engagement insights for managers and leaders. The company supports managers to enable discussion with their teams about survey results and actions. For the first time, colleagues were given access to their personal survey results, allowing them to track their own engagement journeys.

## Our Supply Chain Human Rights programme

### Our governance

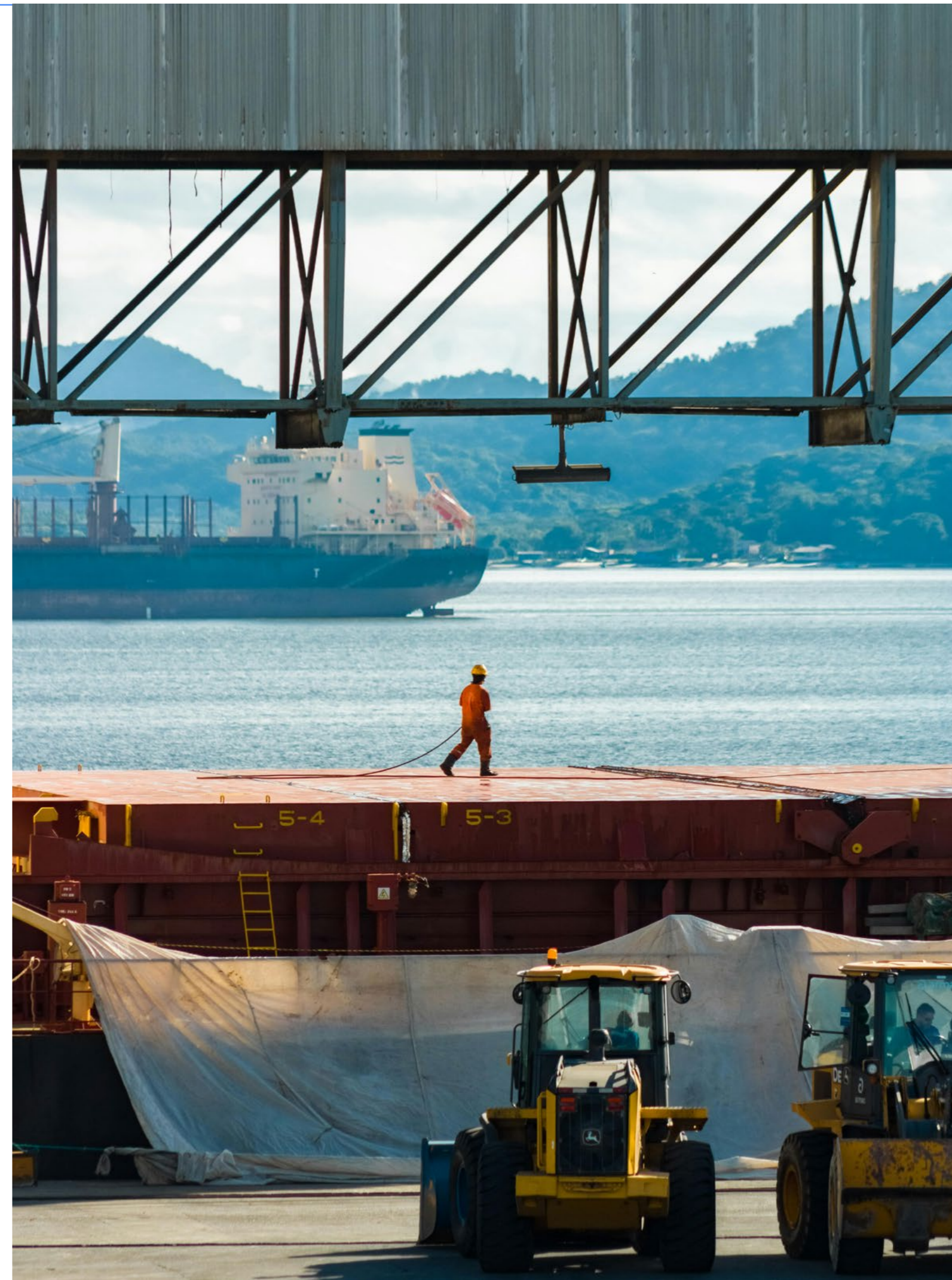
Our SCHR Working Group (SCHRWG) is responsible for the development of our SCHR programme. The SCHRWG includes representation from various teams across Drax, including those deemed 'at higher risk' of encountering human rights breaches (based upon the nature of their engagement with current and potential partners in our supply chain). These teams include Business Ethics, Sustainability, Procurement, Logistics, Human Resources and Health & Safety. In 2024, we extended the SCHRWG to include representation from the Diversity, Equity and Inclusion (DE&I) team.

A quarterly report on SCHR programme activity is provided to the Ethics and Business Conduct Committee (EBCC). The EBCC is a sub-committee of the Drax Executive Committee (ExCom), which oversees the programme. The EBCC is responsible for making sure that Drax takes appropriate steps to assess and respond to the risk of human rights breaches within our own business, and our supply chains. Periodic reports on the EBCC's activity and decisions are submitted to our Audit Committee.

If we discover a human rights breach, we have an EBCC approved Remediation procedure which we would seek to follow in conjunction with the relevant third party.

In May 2024, Slave Free Alliance completed a gap analysis of our SCHR programme and identified 27 possible actions. We're intending to use some of the findings as opportunities to further improve efforts in 2025 and beyond.

Work continues to further our understanding of the potential risks and ensure that oversight continues to be effective. Our policies and processes are updated, as appropriate, to ensure they reflect our changing risk profile. We update our policies and processes, as appropriate, to ensure they reflect our changing risk profile.





## Our policies and procedures

Our Group Policy Framework sets out our key principles (in our Codes), our mandatory and standardisation policies and supporting procedures/guidance. We summarise below the documents that link to our SCHR programme, some of which are publicly available via [www.drax.com](http://www.drax.com).

### Policy: Code of Conduct

**Summary:** Our Code of Conduct applies to all colleagues, non-permanent workers and anyone working on behalf of Drax. It sets out our key principles and the expected standards of behaviour.

**How it links to modern slavery:** Our Code of Conduct covers: dignity at work; diversity, equity, and inclusion; human and labour rights. It explains that Drax will not tolerate breaches of human rights and gives details about our various Speak Up reporting channels and approach to non-retaliation.

### Policy: Supplier Code of Conduct

**Summary:** Our Supplier Code of Conduct sets out the standards we expect of our supply chain when working with Drax. It forms part of relevant contracts.

**How it links to modern slavery:** Our Supplier Code of Conduct outlines that suppliers must carry out their business in accordance with applicable laws, rules and regulations: not breach any internationally adopted human rights principles; not engage underage workers, nor subject any workers to any form of modern slavery; comply with all applicable laws in relation to working hours and remuneration; and provide a safe and healthy working environment. It also encourages our UK suppliers to pay the RLW and provides details of our Speak Up service.

### Policy: Human Rights

**Summary:** Our Human Rights policy sets out the human rights standards that Drax abides by, and the prevention and remediation approach we adopt

**How it links to modern slavery:** The policy incorporates key principles including: a safe and healthy workplace; dignity at work; working hours; wages and benefits (fair pay); diversity, equity and inclusion; collective bargaining and freedom of association; forced labour and human trafficking; and child labour.

### Policy: Indigenous People

**Summary:** Our Indigenous Peoples policy explains our commitment to effective and respectful engagement with communities in the places in which we already operate or seek to undertake business. It reflects ongoing activities with those communities in sharing information about our operations, projects, economic benefits, and associated risks, as well as the desire to collaborate and appropriately address feedback.

**How it links to modern slavery:** Indigenous People have a high degree of dependence on natural resources for their traditional livelihoods. The policy highlights the Drax commitment to working with Indigenous People and communities in a manner that recognises and respects them in how we engage with them in addition to upholding their legal, constitutional, and international rights.

### Policy: Responsible Sourcing

**Summary:** Our Responsible Sourcing policy, published on the Drax website, outlines the criteria by which we source the biomass used at Drax Power Station. It addresses principles related to climate, nature, and people, including a commitment to supporting people and communities.

**How it links to modern slavery:** As part of our Responsible Sourcing commitment, we:

- Promote respect for human rights, including safeguarding the labour rights of workers
- Use certification schemes/chain of custody processes that aim to deliver traceability on both the origin of our biomass and the associated supply chain

### Policy: Global Procurement (non-fuel)

**Summary:** This policy sets out principles relating to procuring and/or contracting with third parties. It provides resources to colleagues to ensure appropriate assessment of suppliers takes place and outlines the governance required before we make any commitments.

**How it links to modern slavery:** The policy instructs colleagues to ensure that regulatory due diligence is carried out. Our Global Procurement Policy was issued in December 2022 and is currently undergoing an extensive review. Several dashboards have been developed in 2024 to support the monitoring of correct policy use. Our Procurement team continues to focus on training and support for ongoing compliance with the policy

### Policy: Safety, Health and Wellbeing

**Summary:** Our combined Group-wide Safety, Health and Wellbeing policy outlines our 'OneSafeDrax' vision and our commitment to everyone finishing their working day safe and well. Individual business units prepare an additional statement of how they will implement the Group policy.

**How it links to modern slavery:** Our people are at the heart of everything we do, and colleague wellbeing is important to our overall success. The Group policy, signed by the Chair of our Board and our CEO, sets out what we aim to achieve. It also emphasises that all Drax employees play a key part in their own safety, health and wellbeing and that of their colleagues.

### Policy: Speak Up (whistleblowing)

**Summary:** Our Speak Up (whistleblowing) policy – and wider programme – provides a mechanism for colleagues, and other people who work with Drax, to confidentially raise concerns in good faith while ensuring protection from victimisation or retaliation. Reports can be anonymous, and the mechanism is available online and by telephone at any time. Each concern is reviewed and where appropriate a robust and impartial investigation takes place. Throughout 2024, we furthered awareness of Speak Up through training, newsletters, case studies, online and in-person events.

**How it links to modern slavery:** The programme ensures that our colleagues, suppliers, communities, and others have a means of reporting genuine concerns (including in relation to modern slavery).





## Our Risk Assessment and Due Diligence

Our supply chain operates across multiple jurisdictions and industries (including forestry, manufacturing, freight and logistics, engineering, construction, IT, and site services). We recognise that as our business grows into new territories and sectors, and we engage with a wider network of business partners, the potential risk that incidents of modern slavery arise also expands. Therefore, it's important that our risk assessments and our practices continue to evolve.

### Country approval

Global rights indices contribute to our risk assessment of potential suppliers. Where higher risks are identified during our due diligence process, we escalate and pursue enquiries more directly with the support of our dedicated Ethical Due Diligence (EDD) team.

Our EDD Framework requires that we appropriately review and approve higher risk countries before accepting any third-party relationships in such a country.

In 2024, we implemented a new country risk assessment tool. The tool enables us to assess countries/regions against several risk indices, to determine whether we consider it appropriate to undertake business there.

### Second line assurance activity

In 2024, we continued to build on our second line EDD assurance activity. Key findings were reported to the EBCC.

### Supplier acceptance and supplier data

Proportionate EDD checks are carried out on business partners and, where appropriate, their associated persons and supply chain. Should we identify concerns during the process, we may obtain enhanced due diligence and seek additional evidence from the business partner before escalating to the EBCC. The EBCC (or as appropriate to the issues under consideration, ExCom) will then consider whether to appoint the business partner based upon the analysis presented.

In 2024, we enhanced our supplier Self-Assessment Questionnaires to incorporate additional key data points. This also meant we were able to improve supplier categorisation. Understanding our suppliers better allows us to conduct more in-depth due diligence where we see a higher risk.

### Ethical due diligence systems

We use a due diligence platform that enables us to carry out EDD, as relevant, across Drax. We perform initial EDD and monitor relevant business partners. As applicable, we collect supply chain risk intelligence via questionnaires, allowing us to ask for further information when answers indicate a higher risk. We explore opportunities to enhance our systems and processes.

In February 2024, we launched a 'checker' tool to help colleagues determine when due diligence is required (this was a joint effort between the Business Ethics, Data Protection and Security teams). Deployment was accompanied by an internal communication campaign on third party due diligence.

### Gap Analysis

In May 2024, we concluded a gap analysis with Slave-Free Alliance (SFA); an international enterprise, wholly owned by global anti-slavery charity Hope for Justice. Conducted against legislation, plus business and human rights best practice, the SFA Gap Analysis provided an independent review of our understanding and response to human rights risks. The report highlighted 27 possible strengthening opportunities and identified the most salient human rights risks for Drax. We have already started to address two third of these.

In 2025 we expect to focus on the six highest priorities and where we're likely to have the most impact. These include the development of a Human Rights strategy, gaining greater insight into suppliers' commitments to human rights and conducting a Training Needs Analysis to identify roles within our business that carry a higher risk of encountering Modern Slavery.

### Modern slavery instances

In 2024, our EDD processes did not identify instances of modern slavery in our supply chain.

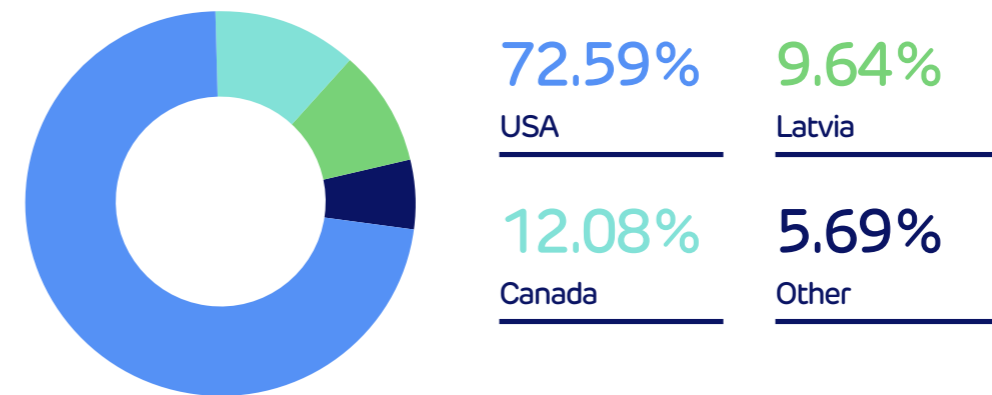




## Fuel procurement

The below graphic illustrate our 2024 global fuel procurement (for consumption, third-party supply, and third party to third party trade), by percentage of volume and geography. Further information please refer to our annual report.

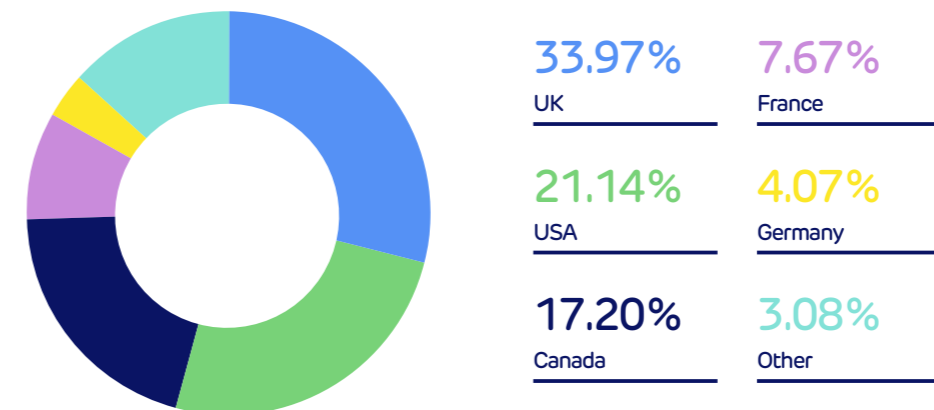
### 2024 global fuel procurement (for consumption, third-party supply and third party to third party trade)



## Non-fuel procurement

The below graphic illustrates our 2024 global non-fuel procurement activity (with our direct suppliers). c.98% of our spend is in countries that we consider lower risk.

### 2024 Non-fuel procurement spend % by country



## Our awareness and training

In 2024, we:

- Developed a new Modern Slavery training module, which was rolled out to all teams considered 'at higher risk' of encountering potential SCHR issues
- Held a company-wide webinar with a survivor of Modern Slavery (known as a 'Lived Experience Consultant') who shared their first-hand experience of labour exploitation and debt bondage. The purpose of the webinar, set up through a partnership with ethical consultants Align, was to gain first-hand insight and to raise awareness of spotting the signs. The event also included a guest speaker from the Centre of Social Justice.
- Created and delivered Modern Slavery 'Spot the Signs' training to colleagues in our Fibre Procurement teams
- Delivered Business Ethics Roadshows in the UK, Canada and US (including SCHR content)
- Continued to deploy mandatory annual Anti-Bribery & Corruption and Security refresher training to all colleagues across Drax
- Deployed our fourth annual Code of Conduct refresher eLearning to all colleagues across Drax (including SCHR content)
- Deployed Business Ethics for Senior Leaders training (including SCHR content) to our senior leadership team
- Marked Anti-Slavery Day (18 October) with a senior leaders Supply Chain Event hosted by the Utilities Against Slavery Working Group (part of Slave Free-Alliance), which our Procurement and Business Ethics teams attended





## Speak Up

We are committed to transparency, openness, and continuous improvement. We encourage those who work for and on behalf of Drax, and our third parties, to raise genuine concerns (via our reporting channels) about practices that could breach laws, regulation, or our own standards.

Anyone can report concerns (anonymously if they wish) using our confidential, global Speak Up service. Accessible online and through dedicated telephone hotlines, this service is available at any time and in over 175 languages. The Business Ethics team triages each report and determines a proportionate and appropriate approach to independent investigation and timely remediation.

Drax does not tolerate any form of retaliation against anyone raising a concern in good faith. We consider any form of retaliation an act of gross misconduct.

The Drax Whistleblowing Officer maintains independent oversight of the remediation of Speak Up concerns, and the outcomes are reported to EBCC, ExCom, Board and the Audit Committee.

No concerns relating to human rights breaches/modern slavery were reported via our Speak Up channels in 2024.



## Working together

To bring about meaningful change and eradicate human rights abuses, we recognise that collaboration is required. We engage with NGOs, charities, authorities and other businesses to promote awareness and to demonstrate the responsibility that businesses play in driving positive change.

A summary of our 2024 activity is provided below:

### Organisation: Sustainable Biomass Program (SBP)

**Summary of activity:** SBP is an independently run certification body for woody biomass (mostly in the form of wood pellets and wood chips) used in industrial, large-scale production of biomass for electricity generation. The SBP proactively encourages the adoption of standards and due diligence processes, which include the promotion of human rights. For suppliers to be approved under the certification scheme, they must satisfy multiple requirements, including those aligned with modern slavery due diligence. Further information on SBP is available on its website. <https://sbp-cert.org/>

### Organisation: United Nations Global Compact (UNGC)

**Summary of activity:** Since 2018, we've been a participant in the UNGC, a voluntary corporate sustainability initiative that encourages businesses worldwide to adopt sustainable and socially responsible practices. Our [Annual Reports](#) form our yearly 'communication on progress', set against the UNGC's Ten Principles on human rights, labour, environment, and anti-corruption, and on actions to support the Sustainable Development Goals. As a member of the UNGC Modern Slavery Working Group, we collaborate with peers, developing and enhancing our approach to addressing the risks of modern slavery. Our commitment to UNGC will continue into 2025.

### Organisation: Unseen UK

**Summary of activity:** [Unseen UK](#) is a charity providing independent support to those affected by trafficking and modern slavery. Unseen runs the UK Modern Slavery and Exploitation Helpline, providing free, independent information and advice 24/7 to potential victims, businesses, the public and statutory agencies.

In 2024, we donated £10,000 to Unseen which went to directly supporting the operation of its helpline. Unseen's last annual report illustrated that in 2023 the helpline took 8,367 calls (from over 31 different countries) and 3,333 web submissions. The calls resulted in 1,845 referrals to agencies including the police, law authorities, HMRC, the Gangmasters and Labour Abuse Authority and NGOs. We hope to continue our support to Unseen and to further strengthen our collaboration.

### Organisation: Slave Free Alliance

**Summary of activity:** We're members of Utilities Against Slavery (UAS), a working group of utility peers run by international social enterprise Slave Free Alliance (SFA). SFA is a non-profit group wholly owned by global anti-slavery charity Hope for Justice.

The purpose of the UAS is to share best practice, discuss areas of mutual concern and to collaborate to produce a coordinated response in eradicating modern slavery. In 2024, UAS focused on three key areas: supply chain; engagement; and training. In 2025, we hope to deliver a suite of training (available to all members) and to finalise a Supply Chain Toolkit for the sector.

In 2023, UAS collaborated to produce an 'at higher risk' procurement sectors list. In April 2024, that list was reviewed and updated. Drax utilises this list as part of its risk assessment process.

In April 2024, Slave Free Alliance completed its gap analysis of our SCHR programme and identified 27 possible development opportunities, with six high priority recommendations. We've integrated these into the SCHR programme to underpin our continuous improvement approach.

### Organisation: Mission to Seafarers

**Summary of activity:** Mission to Seafarers is a welfare charity providing practical, emotional and spiritual support to seafarers. In the Seafarers Happiness Index (May 2023), poor communication was identified as the main issue impacting seafarers. In February 2024, along with the support of some of our logistics partners, we were able to provide MiFi units to the charity, to enable crews to utilise free Wi-Fi whilst at the ports of Immingham and Hull (noting that over 60% of the sustainable wood pellets used by Drax in the UK are delivered via the River Humber and these ports).

In December 2024, Drax contributed funding to support 600 Christmas parcels for seafarers at the ports of Immingham and Hull. A number of our colleagues volunteered, across two days, to pack and deliver the gifts. In Canada, we gifted the crew members of our three charter vessels with SIM cards and sweatshirts.

### Organisation: Stella Maris

**Summary of activity:** Stella Maris is an international maritime charity supporting seafarers, fishers and their families; it has the largest ship visiting network in the world. In 2024, Drax became part of the charity's cross-sector steering group to help tackle modern slavery in UK ports. The charity comprises 23 individual stakeholders including ferry operators, port owners, recruitment agencies, authorities, charities, border force and global businesses.

### Organisation: Align

**Summary of activity:** Align is an ethical consultancy that accelerates the inclusion of experts with 'lived experience of modern slavery' into businesses. To acknowledge Anti-Slavery Day in the UK, we hosted a company-wide webinar with a Lived Experience Consultant who shared their harrowing, first-hand experience of labour exploitation and debt bondage. The webinar also included a guest speaker from the Centre of Social Justice. We have a further webinar scheduled for February 2025 in North America with a US Lived Experience Consultant.





## Measuring our progress in 2024

**Metric:** Provide proportionate levels of training to colleagues, including new starters, senior management and teams considered 'at higher risk' of encountering modern slavery

- Continued to deploy the Code of Conduct to new starters
- Deployed Code of Conduct refresher training (including SCHR content) to existing colleagues across Drax
- Developed and deployed new Modern Slavery training to teams considered 'at higher risk' of encountering supply chain human rights issues
- Deployed 'Business Ethics for Senior Leaders' refresher training (including SCHR content) to our Senior Leadership team
- Delivered multiple face-to-face Business Ethics Roadshows (including SCHR content)

**Metric:** Modern Slavery investigations outstanding

- Nil

**Metric:** Maintain up to date due diligence information on supply chains that are high risk for modern slavery

- Assessed that two 'at higher risk' active fuel supply chains required refreshed due diligence in 2024. These refreshers commenced in 2025 and were all completed as at the date of this Statement.

**Metric:** Collaborate with others to promote awareness of modern slavery

- Continued engagement with UN Global Compact, Slave Free Alliance and Unseen
- Marked Anti-Slavery Day (18 October) with a Senior Leaders Supply Chain event hosted by the UAS working group
- With ethical consultancy Align, hosted a company-wide webinar with a Lived Experience Consultant, sharing their first-hand experience of labour exploitation and debt bondage. This webinar also included a guest speaker from the Centre of Social Justice

**Metric:** % of SBP compliant woody biomass received at Drax Power Station

- 98.6%

**Metric:** Strengthen supply chain auditing and verification processes

- Worked with a third-party ethical auditing expert to develop an ethical audit and undertook several audits (most of which were conducted on a semi-announced basis)
- Launched a programme of ethical audits, conducted on five suppliers operating in industries considered at higher risk of modern slavery. Audits were well received amongst suppliers and highlighted both good practices and potential areas for improvement. We continue to work collaboratively with suppliers to make positive improvements in their businesses
- Conducted a biomass supplier visit with the support of global non-profit organisation and sustainable certification body 'Preferred by Nature' (to verify Greenhouse Gas data/supply chain transparency/information provided during onboarding/due diligence process) and to inform a framework for future visits
- Members of the Drax Compliance team completed Forest Stewardship Council (FSC) Forest Management and FSC Chain of Custody Expert training courses. Preferred by Nature, which is authorised/accredited by FSC, provides these courses. In 2025, we plan to extend this training to additional colleagues
- The Compliance team reviewed its supplier due diligence process, enhancing self-assessment questionnaires to non SBP certified suppliers. We'll roll out this process to include the wider onboarding and due diligence activities

**Metric:** Completion of Code of Conduct refresher training by relevant colleagues

- 100%

**Metric:** Time elapsed since completion of latest SCHR programme risk assessment

- Annual SCHR programme risk assessment last completed in October 2024 (within standard review cycle)



# 2025 focus

In 2025, our focus will be to:

- Progress recommendations from the Slave Free Alliance Gap Analysis of our SCHR programme
- Continue to progress the supply chain mapping of 'higher risk' non-fuel suppliers
- Continue to sample audit our supply chain to assess how they are meeting ethical and regulatory standards
- Continue to collaborate with our supply chain to promote fundamental human and labour rights

## Statement Scope

This statement applies to Drax Group plc and the following subsidiaries:

- Drax Biomass Inc
- Drax Power Limited
- Drax River Hydro Limited
- Drax Pumped Storage Limited
- Opus Energy Limited
- Opus Energy (Corporate) Limited
- Opus Energy Renewables Limited
- Drax Energy Solutions Limited
- Pinnacle Renewable Energy Inc.

See our website ([drax.com](https://www.drax.com)) for general information, and to see our earlier modern slavery statements.

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[www.drax.com](https://www.drax.com)