



Anti-Slavery Statement

At Holtec-Britain, we are committed to preventing modern slavery and human trafficking in our operations. Holtec has a zero-tolerance approach to modern slavery human trafficking in its operations and supply chain.

Organization Structure and Supply Chains

Holtec Britain is an international division of Holtec International, registered and operated in the U.K. Holtec Britain's operations cover nuclear waste management, irradiated fuel management, nuclear decommissioning, and development of Holtec's Small Modular Reactor SMR-160. Holtec Britain's capabilities include project management, design engineering, manufacturing oversight and site services – including both new construction or decommissioning and demolition.

We recognize that our risk regarding modern slavery and human trafficking lies in our supply chains. Depending upon the requirements of each project, participants in these supply chains might include subcontractors, equipment and material suppliers, and a variety of specialized service providers. Our Supplier Selection Procedure includes checks of the Supplier's reputation, respect for the law, and compliance with health, safety and environmental standards.

Policies

Holtec's Corporate Governance and Ethics Manual (CD-07) regulates our commitment to doing business with our clients and suppliers in a manner consistent with our values on integrity, civility, accountability, teamwork and open communications. The Corporate Governance and Ethics Manual summarizes Holtec's expectations and governing principles, including those related to human rights.

Compliance with the Corporate Governance and Ethics Policy is mandatory for all personnel: it is a condition of working with us. We commit to undertake business with integrity and expect our suppliers, subcontractors and consultants to respect and adhere to our values and high ethical standards of conduct.

Holtec expects our clients and suppliers to commit to:

- sharing Holtec's commitment to protecting the health, safety and security of employees and others who could be affected by its activities
- respecting the human rights of all employees

Holtec's suppliers are required to consult Corporate Governance and Ethics Manual - CD-07 to ensure their business interactions with the Company are in full compliance with the Company's corporate ethics requirements. A copy of Corporate Governance and Ethics Policy - CD-07 is shared with our Suppliers.

The Company Ethics Hotline, +1-800-HOLTECØ EXT 3618, provides a confidential, independently operated hotline for it's the Global Company's employees, clients and suppliers to voice any concerns that they have, including concerns about slavery and human trafficking. The Ethics Hotline is available to any Suppliers and is listed in all Supplier purchase orders.



We also have human resources governance documents to protect our personnel and potential personnel from modern slavery and human trafficking.

Due Diligence

At Holtec Britain, we expect third parties (Clients and Suppliers) that we work with to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out due diligence as may be dictated based on the level of risk.

The Integrity Check verifies if the third party is listed on international data sources, has a history of corruption, collusion, fraud or labor/human right issues, is a state-owned entity or politically exposed person, or appears on Holtec's Excluded Entities List.

The Vendor Integrity Verification process is an integral part of Holtec Britain's Integrity program. It uses multiple tools to ensure vendors are ethical through a rigorous screening and ongoing monitoring process. Suppliers are required to accept integrity-related contractual provisions and adhere to our Corporate Governance and Ethics requirements.

Risk assessment and management

Holtec Britain undertakes risk assessments to determine where our operations present a higher risk of modern slavery and human trafficking. Where we identify higher risks, we implement mitigation measures (e.g., enhanced due diligence). Significant risk is known to reside in the use of agency/temporary workers. The risk is heightened in the case of migrant workers. Holtec has mapped out our use of such workers on our worksites, by country of origin (where applicable) and country of deployment and compared that against indices such as the Global Slavery Index and the Human Freedom Index.

Key performance indicators to measure effectiveness of steps being taken

Holtec Britain has introduced the following key performance indicators (KPIs). The indicators and activities are reviewed at least annually.

Supplier engagement: 100% of our suppliers to have agreed to the supplier Corporate Governance and Ethics Requirements.

Ethics Training: Ensure that 100% of all existing and new employees, and contractors complete the compulsory Ethics and Modern Slavery training. Ensure that 100% of employees who have roles dealing with suppliers, receive ongoing updates and notifications regarding business & human rights, and specifically Modern Slavery.

Training on Modern Slavery and Trafficking

Every year, Holtec personnel at all levels are required to complete a mandatory certification process to ensure that our Corporate Governance and Ethics Manual is understood and properly applied to our daily activities. For Holtec associates, we ensure awareness of our Corporate Governance and Ethics



Manual by providing timely information by various means such as onboarding presentations, posters, and during daily meetings. Key principles are brought up in e-tutorials, known as Training Tablets, which frequently pop-up when logged into a company computer, and were specifically developed to aid understanding and knowledge of the principles covered by the Corporate Governance and Ethics Manual. The modern slavery and human trafficking toolbox (which includes posters and a facilitation guide) provides our workforce with a summary of our modern slavery and human trafficking principles, giving real life examples and advising how to report any suspected or known violations. To ensure a good understanding of the risks of modern slavery and human trafficking in our supply chains and business, we provide additional training for personnel in key positions.

Declaration

This statement is made by Holtec Britain Ltd. It is written for the financial year ending 31 Dec 2022 in order to meet the requirements of Section 54 of the UK Modern Slavery Act 2015.

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