

## MODERN SLAVERY STATEMENT

### Introduction

This statement is made pursuant to s54 of the Modern Slavery Act 2015 ("Slavery Act") and sets out the steps that Aurora Energy Research Limited and Emperor UK Topco Limited ("Aurora", "we", "our", "us") have taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Aurora has zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain.

This statement is submitted on behalf of Aurora to meet its disclosure obligations as set out in the Slavery Act for the financial year ending in December 2023 in line with our zero-tolerance approach to modern slavery and human trafficking.

### Organisational structure

Aurora has multiple subsidiaries across the globe. This statement is with respect to Aurora and all its subsidiaries, to the extent applicable. In the event that a subsidiary needs to implement additional measures to prevent modern slavery or human trafficking within its supply chain or business, we will ensure that the subsidiary adopts suitable measures. This may involve the subsidiary producing its own modern slavery statement.

### Our business and supply chains

Aurora provides data-driven analytics on energy markets in Europe and globally. Aurora produces valuable intelligence on the global energy transformation through forecasts, reports, forums and bespoke consultancy services.

Aurora works with various vendors, business partners, and clients in relation to its business including software services, subscription-based services and consultancy services.

We expect that our clients, vendors, and business partners adhere to legal and ethical standards in their operations, incorporating practices that prevent and safeguards against modern slavery and human trafficking within the framework of their business. In our worldwide operations, we strive to ensure that all the services are rendered without modern slavery.

### Our policies

We operate a number of internal processes to ensure that we are conducting business in an ethical and transparent manner. We employ people from all over the world and are committed to ensuring there is no modern-day slavery or human trafficking in our business. We operate a robust recruitment process, through which we conduct eligibility to work in the UK and checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Our workers are all paid at least the appropriate minimum wage, and are not subjected to unsafe working conditions. We are committed to promoting fair employment practices and ensuring adherence to legal and regulatory requirements.

We are dedicated to upholding basic human rights and firmly believe in the equitable and respectful treatment of all individuals worldwide. Our business values and culture embody these principles, underscoring our commitment to responsible business practices. Our Employee Handbook details the code of conduct expected from employees in line with our ethical values.

## **Our due diligence processes**

We undertake screening of our prospective employees, clients, and business partners in accordance with our internal policies and strive to ensure adherence to our ethical standards.

## **Our risk assessment and mitigation processes**

We are committed to ensuring that our business in its interactions with supply chains, and partnerships, does not compromise human dignity or unintentionally contribute to modern forms of slavery or human trafficking. Given the nature of our business, we believe that the activities we engage in are not particularly susceptible to or targeted by modern forms of slavery and human trafficking, and we assess the risk as low. We are consistently striving to work with reputed vendors and business partners that are ethically driven, and work in a transparent manner.

We remain vigilant and dedicated to taking our responsibilities seriously, actively supporting the objectives to eliminate these inhumane practices. In this financial year, we have had no reported instances of modern slavery and human trafficking. We consistently review our internal systems and processes to ensure we are in line with our commitment to prevent modern slavery and human trafficking.

## **Training**

We conduct various training sessions for our employees and provide induction training for new hires to enhance awareness and educate them about our values, culture and policies.

## **Our continuing commitment**

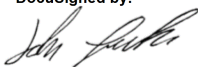
We will continue our commitment to ensuring that slavery and/or human trafficking is not taking place within our business or supply chain in the following ways (but not limited to):

- We will continually review our practices for checking all employees are paid at least the minimum wage, and have the right to work in the United Kingdom
- We will encourage the reporting of concerns in relation to any instances of misconduct or misdemeanours in relation to our business, and put in place suitable whistleblowing procedures
- We will not knowingly support or deal with any business involved in slavery or human trafficking
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain to comply with our values.

## **Declaration**

This statement was approved on 27 March 2024 by our board of directors and is reviewed and updated annually.

Signed on the behalf of Aurora Energy Research Limited and Emperor UK Topco Limited:

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**John Feddersen**

Director