



Modern Slavery & Human Trafficking Statement 2025


Sizewell C

INTRODUCTION



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Sizewell C Limited is committed to operating as a responsible business that respects human rights and has zero tolerance for modern slavery and human trafficking.

This statement covers the financial year ending 31 March 2026 and sets out the approach taken by Sizewell C to identify, assess and manage the risk of modern slavery and human trafficking within our operations and supply chain.

While Sizewell C is not required to publish a statement under the Modern Slavery Act 2015, the scale and nature of our project, together with the high ethical standards we uphold, mean that modern slavery risk remains a key priority. As reflected in our Corporate Code of Conduct, we are committed to identifying, preventing, and addressing these risks across our business and supply chain.

We assess the effectiveness of our approach through ongoing due diligence, supply chain screening, workforce assurance, training, and reporting channels. These controls help us identify and address risks early, protecting people and reducing the potential for disruption, delays, additional costs, and adverse impacts on project delivery.

Sizewell C Limited is responsible for the construction of Sizewell C, a 3.2 gigawatt nuclear power station on the Suffolk coast in the East of England. Once operational, the station will provide low-carbon electricity to approximately 6 million homes for at least 60 years, supporting around 7% of the UK’s current electricity needs.

In November 2025, Sizewell C reached financial close, securing long-term investment from a consortium of shareholders including La Caisse, Centrica, Amber Infrastructure, His Majesty’s Government and EDF. This milestone marked the transition to full independence in financial, transactional and governance terms.

Our mission, is to establish a leading company to build and operate a nuclear power station, and our strategy enables us to deliver safe, secure and clean energy, create lasting social value in the East of England, and contribute long-term benefits to the UK economy. This includes prioritising local employment, skills development and responsible procurement, recognising that strong local engagement can help reduce vulnerability to exploitation.

We are committed to delivering 70% of the project’s construction value through UK businesses and expect to invest more than £4.4 billion in the East of England. The project will create around 10,000 direct jobs and support many more across the UK. Our workforce model comprises a combination of direct employees and a large, site-based contractor workforce.

Sizewell C is a large and complex infrastructure project delivered through a multi-tiered supply chain, with a significant proportion of works contracted through Tier 1 suppliers and their subcontractors. Our supply chain spans multiple geographies and sectors, including construction, engineering, manufacturing, and professional services. This operating model gives rise to inherent modern slavery and human trafficking risks, particularly in lower-tier supply chains, labour provision and the sourcing of materials.

Given the scale of the project, our delivery model and geographic footprint, we recognise inherent modern slavery and human trafficking risks in both our operations and supply chain. We manage these through a risk-based approach because failures in this area can harm workers and create significant commercial consequences, including rework, supplier disruption, reputational damage, cost increases and pressure on schedule and delivery.

A recent human rights risk assessment was conducted, with particular attention to the construction phase and all associated activities. The review did not identify any significant concerns; it confirmed the presence of well-established systems and procedures, either implemented or in development, to facilitate effective risk identification, prevention, and mitigation. While projects of this magnitude and complexity naturally present contextual risks and challenges within the sector—though none were noted as actual live risks at Sizewell C—the report includes recommendations that are currently being addressed to proactively manage these issues and ensure continued adherence to the UN Guiding Principles on Human Rights.



OUR SUPPLY CHAIN

We are committed to working with suppliers who share our expectation of a supply chain free from modern slavery. We expect all suppliers to take appropriate steps to identify, assess and manage modern slavery risks within their own operations and supply chains.

Our supply chain spans multiple geographies, with suppliers based in the **United Kingdom, France, Germany, Italy, Luxembourg, Spain, Switzerland, Sweden, the United States and, China.**

We procure a broad range of goods and services, including construction services, engineering and manufacturing inputs, labour provision and professional services. These are typically delivered through Tier 1 suppliers and their subcontractors within a multi-tiered supply chain model.

To ensure alignment with our standards, Tier 1 suppliers are subject to initial and ongoing due diligence. This includes structured assessments designed to identify and evaluate modern slavery risks and ensure that suppliers meet our expectations for ethical business conduct.

Our Procurement and Contracting Strategy draws on the established supply chain model developed for our sister project, Hinkley Point C, utilising an intelligent replication strategy and enabling the sharing of lessons learned and supporting a consistent and responsible approach to sourcing.

As part of our procurement processes, we incorporate sustainability considerations, including the application of minimum sustainability benchmarks. These requirements support the identification, assessment and management of modern slavery risks across our supply chain.

The Human Rights Risk Assessment included targeted analysis of our supply chain and priority raw materials, including steel, cement and fuels, considering country of origin, sector exposure and labour intensity. No issues were identified in our supply chain, but the assessment confirmed inherent risks in construction supply chains, particularly in upstream extraction, processing, transportation and lower-tier suppliers.

These findings help us focus enhanced due diligence and monitoring on the areas of greatest exposure, reducing the risk of supplier failure, material disruption, cost escalation and delivery delay.



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We recognise that our workforce model creates potential modern slavery risks, particularly across a large site-based contractor population. We therefore take a risk-based approach to protecting everyone working on or connected to the project, because weak labour controls can lead not only to harm to individuals but also to workforce disruption, legal and reputational issues, productivity loss and impacts on cost, schedule and delivery.

WORKFORCE PROTECTIONS AND DUE DILIGENCE

We apply pre-employment checks across the workforce, including identity verification, right to work checks, and capability assessments. For contractors and agency workers, these checks are delivered through our workforce assurance processes and third-party providers, with appropriate oversight in place.

We operate a controlled approach to labour engagement through our Tier 1 suppliers, with additional due diligence undertaken where labour agencies are utilised. This supports the identification and management of risks associated with labour provision.

AWARENESS AND REPORTING

All workers are required to complete the Sizewell C Site Induction prior to accessing site. This includes training on modern slavery, how to recognise indicators of exploitation, and the steps to take if concerns arise.

We provide access to an external, confidential Speak Up service, enabling employees and contractors to raise concerns, including anonymously where preferred.

We continue to raise awareness through targeted communications, training, and guidance materials to ensure information is accessible to our diverse workforce.

WORKER ENGAGEMENT AND WELFARE

Our Industrial Relations Construction Agreements, supported by Transitional Arrangements and Minimum Standards (TAMS), set expectations for fair recruitment, working conditions, pay, and worker representation.

These arrangements are supported by structured governance, including oversight through the TAMS Committee, which brings together Sizewell C, contractors, and trade unions to oversee workforce practices and address emerging issues.

This framework supports the identification and management of modern slavery risks within our workforce and provides structured oversight of workforce practices.

COMMUNITY

We also recognise the importance of working beyond our site boundary, including engaging with local communities to support the identification and management of modern slavery risks.

Through our security function, we work in collaboration with local police, security partners, and community organisations to share intelligence, raise awareness and support wider efforts to prevent exploitation. We also use key moments in the calendar, such as Anti-Slavery Day, to promote awareness and reinforce our commitment to tackling modern slavery both within our operations and in the communities in which we operate. Through this engagement, we aim to support the identification of vulnerable individuals and contribute to broader safeguarding efforts to identify and protect vulnerable individuals and reduce the risk of exploitation.



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The Corporate Compliance and Ethics function has overall oversight of modern slavery and human rights risks at Sizewell C, working in partnership with the Supply Chain and Human Resources functions.

We maintain a framework of policies and standards that set clear expectations for ethical conduct across our operations and supply chain. These include:

- our Corporate Code of Conduct;
- our Worker Code of Conduct; and
- our Ethics and Business Conduct Policy

These policies set clear expectations in relation to human rights, ethical business conduct, and the management of modern slavery risks, and require individuals to raise concerns where issues are identified.

They are supported by mandatory training and guidance materials to ensure that employees and contractors understand their responsibilities and are equipped to identify and report concerns.

We have also implemented a Speak Up Policy and supporting procedures to ensure that concerns are handled consistently and with appropriate governance and oversight.

Together, this framework supports the identification, escalation, and management of modern slavery and human rights risks, and promotes a culture of integrity, transparency, and accountability.



RISK ASSESSMENT & MANAGEMENT

We recognise that our exposure to modern slavery and human trafficking risks is dynamic and influenced by factors such as supply chain complexity, labour market conditions, and wider geopolitical developments.

We take a risk-based approach to identifying, assessing, and managing these risks, informed by due diligence, supply chain monitoring, workforce assurance, and the findings of our Human Rights Risk Assessment.

This enables us to focus action on the areas of greatest exposure and to reduce the risk of harm to people, as well as associated impacts on commercial performance, cost, schedule and delivery.

We also engage with industry partners and stakeholders to share best practice and strengthen our overall approach.

Where concerns are identified, we will investigate and take appropriate action, which may include remediation and, where necessary, working with suppliers and partners to address issues and prevent recurrence.

CONTINUOUS IMPROVEMENT:

We aim to continuously strengthen our approach through targeted improvements to governance, risk management, and stakeholder engagement. Key initiatives include:

- establishing a Modern Slavery Steering Committee;
- introducing a network of Speak Up Champions; and
- implementing recommendations arising from the Human Rights Risk Assessment

Through these actions, we aim to strengthen prevention, improve oversight, and enhance our ability to identify and respond to risks early, supporting better outcomes for workers and more resilient project delivery.

Looking ahead

Over the next financial year, our focus will be on delivering these priorities in practice.

This will include integrating the Human Rights Risk Assessment recommendations into business planning, tracking implementation and emerging themes through governance forums, reinforcing expectations through communications and induction activity, and applying enhanced due diligence in higher-risk areas of the supply chain and labour model. In this way, we will move from programme development into more systematic delivery and oversight.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Sizewell C’s slavery and human trafficking statement for the financial year ending 31 March 2026.

This statement was approved by the Board of Directors of Sizewell C Limited on 26th August 2026 and signed on its behalf by:

Nigel Cann
Chief Executive Office

For and on behalf of the Board of Sizewell C Limited



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