



## EDF TRADING

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## Annual Report for reporting year 2025 in respect of

### ***Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act)***

EDF Trading Europe Limited

EDF Trading North America, LLC

EDF Trading Limited

EDF Trading Europe Limited (**EDFT EU**) is an Irish company that engages in, among other things, the purchase and sale of bioethanol within Canada. EDF Trading North America, LLC (**EDFTNA**) is a Texas limited liability corporation that engages in, among other things, wholesale gas and power trading within Canada.

EDFT EU is a 100% subsidiary of EDF Trading Limited (**EDFT**). EDFTNA is controlled by EDFT as part of EDFT's remit to the wider group of companies of Electricité de France SA (the **EDF Group**) to provide the EDF Group with a single face to the wholesale energy commodity markets.

This report has been prepared by EDFT as the reporting entity on behalf of itself, EDFT EU and EDFTNA.

### **Reporting for entities**

#### **1. What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity?**

EDFT EU has undertaken the following:

- Maintaining due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains

EDFTNA has undertaken the following:

- Maintaining due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains

Each of EDFT EU and EDFTNA includes within its supply chain contracts a compliance with law clause.

**2. Please provide additional information describing the steps taken.**

As an English company, the Reporting Entity is subject to the *Modern Slavery Act 2015*. It maintained and applied the following policies and procedures throughout 2025:

- The EDF Group Code of Ethics, which upholds the Group's ethical commitments and values.
- Human resources guidelines, which include policies to support equal opportunities and protect against bullying and harassment.
- EDFT's culture of transparency, which explicitly encourages reporting of serious compliance concerns and includes a third party hotline as one way to enable this.
- EDFT's procurement policy, which has a section specific to the *Modern Slavery Act* and requires all employees to consider the goals of the Act in all purchasing decisions.
- Requesting a clause confirming compliance with the *Modern Slavery Act* in all new supplier contracts.
- To help ensure compliance of non-UK suppliers, the majority of EDFT's IT purchases consist of branded products whose suppliers already publish anti-slavery statements in accordance with the California *Transparency in Supply Chains Act* of 2010.
- Ethically responsible recycling of obsolete IT equipment.
- Visiting suppliers abroad where necessary to undertake due diligence to confirm that no practices contrary to the *Modern Slavery Act* are present in the suppliers' operations or supply chains.

**3. Which of the following accurately describes the entity's structure?**

Each entity is a form of corporation. EDFT EU is an Irish company. EDFTNA is a Texas limited liability company. EDFT is an English private limited company.

**4. Which of the following accurately describes the entity's activities?**

EDFT EU and EDFTNA are engaged in selling goods – natural gas for EDFTNA; bioethanol for EDFT EU – within Canada.

EDFTNA is engaged in importing into Canada goods – natural gas – produced outside Canada. EDFT EU may cause the importation of bioethanol into Canada (it is not an importer of record).

Effective as of 1 October 2025, EDFT EU transferred to EDFT all beneficial interest in its bioethanol business. EDFT is planning either to run off its remaining bioethanol trading obligations or exit the bioethanol business altogether.

EDFT controls each of EDFT EU and EDFTNA.

**5. Please provide additional information on the entity's structure, activities and supply chains.**

Following the transfer of its business of physical bioethanol trading to EDFT, EDFT EU focuses on physical gas and power wholesale trading in Europe on behalf of EDFT. It acts as a limited agent on behalf of EDFT for physical bioethanol trading in Canada.

EDFTNA focuses on physical and financial gas and power wholesale trading throughout the US and Canada.

EDFT is active in physical power wholesale trading in Europe and physical gas, financial gas and financial power trading across global markets. It also trades LPG and participates in various compliance and voluntary certificates schemes aimed at ameliorating the causes or reducing the effects of climate change.

**6. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?**

EDFT has policies in place for forced labour. All EDFT's policies apply to both EDFT EU and EDFTNA with logical amendments for context and applicable law.

**6.1 If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour?**

EDFT embeds responsible business conduct into its policies.

**7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour.**

EDFT remains alert to identifying areas of potential risk, and continues to adhere to policies to safeguard the fundamental rights and freedoms of those who work for us and with us.

As is specified in its statement for the *Modern Slavery Act 2015*, EDFT maintains and applies the following policies and procedures:

- EDF Group Code of Ethics, which upholds the Group's ethical commitments and values
- EDFT's culture of transparency, which explicitly encourages reporting of serious compliance concerns
- Procurement policy, which has a section specific to the Modern Slavery Act and requires all employees to consider the goals of the Act in all purchasing decisions
- Requesting a clause confirming compliance with the *Modern Slavery Act* in all new supplier contracts

- To help ensure compliance of non-UK suppliers, the majority of EDFT's IT purchases consist of branded products whose suppliers already publish anti-slavery statements in accordance with California's *Transparency in Supply Chains Act* of 2010.

**8. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

EDFT has identified risks to the best of its knowledge and will continue to strive to identify emerging risks. EDFT considers the risks of forced labour or child labour in its supply chains to be extremely low with respect to wholesale energy commodity trading activities. They are considered very low as well for bioethanol trading activities because all bioethanol sold or purchased in Canada in 2024 has been sourced within Canada or from the US and is purchased from entities who are compliant with the *Clean Fuel Regulations (CFR)* or have received International Sustainability and Carbon Certification from ISSC System GmbH (**ISSC**) or both.

**8.1 If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains?**

EDFT has identified the following forced labour risks in its activities and supply chains:

- The sector or industry it operates in
- The types of products it produces, purchases or distributes
- The locations of its activities, operations or factories
- The types of products it sources
- Tier one (direct) suppliers

**9. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?**

EDFT has identified forced labour risks in the following sectors and industries:

- Utilities
- Wholesale trade

**10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk.**

Given the complexity of wholesale energy production and distribution, EDFT regards the risk of forced labour or child labour being used in the supply chain for wholesale power and gas activities of EDFT EU or EDFTNA as extremely remote. For similar reasons, EDFT regards the risk of forced labour or

child labour in the supply chain for bioethanol as very remote. It also relies on the fact that all product purchased for sale in Canada is compliant with the CFR or has been purchased from ISSC-certified entities or both. Compliance with the CFR and certification in accordance with ISSC involves consideration of a large number of supply chain and environmental issues, including in relation to potential forced labour and child labour.

**11. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

No, because EDFT has not identified any forced labour or child labour in its activities and supply chains.

**11.1 If yes, which remediation measures has the entity taken? Select all that apply.**

Not applicable.

**12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour.**

Not applicable.

**13. Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?**

No, because EDFT has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.

**14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.**

Not applicable.

**15. Does the entity currently provide training to employees on forced labour and/or child labour?**

Other than with respect to its policy statements, no.

**15.1 If yes, is the training mandatory?**

Not applicable.

**16. Please provide additional information on the training the entity provides to employees on forced labour and child labour.**

Not applicable.

**17. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?**

No

**17.1 If yes, what method does the entity use to assess its effectiveness?**

Not applicable.

**18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.**

Not applicable.

This report has been approved by the board of directors of EDF Trading Limited as a reporting entity under and in accordance with the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. 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 purposes of the Act, for the reporting year listed above.

Guido Santi  
Attorney / Chief Legal Officer  
03 February 2026



I have the authority to bind EDF Trading Limited