

MODERN SLAVERY & HUMAN TRAFFICKING

Policy and Procedures



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Modern Slavery & Human Trafficking Version Control

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Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that SWTG has 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. SWTG has a 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 the business or our supply chain.

Application

This policy is applicable to all employees at whatever level of the company's hierarchy, as well as sub-contractors who undertake activities on behalf of the organisation and any visitors to the organisation's premises. This policy and its mandatory application will be communicated to all employees, sub-contractors, visitors and interested parties.

As part of the company's induction process, new starters should be told about this policy and shown where it is located on the organisation's intranet. The HR HSEQ department is responsible for informing job applicants of this policy. Employees are responsible for informing their visitors to the premises of this policy.

Responsibility

Responsibility for SWTG's anti-slavery initiatives is as follows:

- **Policies:** The Board of Directors is responsible for the implementation and review of anti-slavery initiatives, policies, and processes
- **Risk assessments:** Suppliers are required to provide, and a risk analysis is conducted by the senior management team

- Investigations/due diligence: The Board of Directors are responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking
- Training: New policies and processes are shared at least quarterly at staff meetings.

Risk Matrix

The company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking by evaluating suppliers against the following criteria:



Our Policies

SWTG operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistle Blowing Policy: SWTG encourages all its workers, customers, and other business partners to report any concerns related to the direct activities, to the supply chains of SWTG. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. SWTG's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can complete the company's confidential disclosure form.

Employee Code of Conduct: SWTG's code makes clear to employees the actions and behaviour expected of them when representing SWTG. SWTG strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

Supplier's Code of Conduct: SWTG is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. SWTG works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions.

However, serious violations of SWTG's supplier code of conduct will lead to the termination of the business relationship.

Corporate Social Responsibility Policy SWTG is committed to aligning its business values, purpose and strategy with the needs of our clients, whilst embedding ethical principles into everything it does.

Dignity at Work Policy SWTG is committed to creating a work environment where everyone is treated with dignity and respect.

Due Diligence

SWTG undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. SWTG's due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits or assessments;
- Creating an annual risk profile for each supplier;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans as appropriate;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Maintaining this Policy

Seiche Water Technology Group (SWTG) will monitor the effectiveness of this policy and its general compliance within SWTG.

This policy will be kept up to date and amended accordingly to reflect any changes in response to revised legislation and applicable standards and guidelines.

This policy is fully supported by the top management of SWTG. In support of this intent, the policy will be reviewed at least annually. SWTG will provide sufficient financial support and all other necessary resources for the full implementation of this policy.

Approval for this Statement

This statement was approved by the Board of Directors on 18 November 2022.

Name Roy Wyatt

Signature



Date 18 November 2022