| 01-0102 Anti-Slavery Directive | |
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| **Main Document Subject Area** | Administration and General Management |
| **Document Number** | 01-0102 |
| **Next Review Due** | January 2026 |
| **Relevant Policy** | 04-0001 Employment Policy |
| **Responsibility for Implementation** | All staff |
| **Controlled Printed Copies** | None |

| Ver. No. | Date | Details of Revision | Approved by |
|---|---|---|---|
| 1 | 29/03/2017 | Original version incl footer update | General Manager |
| 2 | 14/12/2018 | Various test workflows and updated review date, reviewed and approved by Board Members 13/12/2018 | General Manager |
| 3 | 09/04/2019 | Paragraph removed from section 9 at the request of FCD, Chairman and GM names added to bottom | General Manager |
| 4 | 02/12/2019 | Reviewed following expiry | General Manager |
| 5 | 02/12/2020 | Reviewed following expiry General Manager and Chairman updated only | General Manager |
| 6 | 01/12/2021 | Annual Review, format changes only | General Manager |
| 7 | 15/01/2022 | Updated based on recent audit | General Manager |
| 8 | 23/03/2023 | Annual update as required | General Manager |
| 9 | 23/02/2024 | Annual update as required | General Manager |
| 10 | 17/01/2025 | Annual Update as required | General Manager |

## PERIOD COVERED - 1ST JANUARY TO 31ST DECEMBER 2024

### 1. ANTI SLAVERY AND HUMAN TRAFFICKING DIRECTIVE

As a Company, Marchwood Power Limited maintains relationships with many different organisations in its supply chain, as well as employing many people.

In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains.

Marchwood has adopted a statement on the prevention of modern slavery and human trafficking. The value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf. We expect all who have, or seek to have a business relationship with Marchwood to familiarise themselves with our anti-slavery value and to act at all times in a way which is consistent with it.

### 2. MARCHWOOD POWER LIMITED-ANTI SLAVERY VALUE

As part of our culture of good governance, Marchwood Power Limited has adopted a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015.

We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

## 3. PURPOSE OF THIS DIRECTIVE

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. This document sets out the approach of Marchwood Power Limited (the "Company") with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This directive's use of the term "modern slavery" has the meaning given in the Act.

As a Company, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or those of our suppliers.

## 4. STEPS FOR THE PREVENTION OF MODERN SLAVERY

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with disclosure requirements under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

All employees have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this directive forms part of all employees' obligations under their contract of employment.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measure:

i) conduct risk assessments to determine which parts of our business, if any, and which of our suppliers are most at risk of modern slavery;
ii) engage with our suppliers to convey to them our Anti-Slavery Directive;
iii) engage with our employees to explain our value and highlight the Suggestions and Concerns register should they have any concerns about modern slavery

## 5. RESPONSIBILITY FOR THE DIRECTIVE

Ultimate responsibility for the prevention of modern slavery rests with the Company's leadership. The Board of Directors of the Company has overall responsibility for ensuring this directive and its implementation complies with our legal and ethical obligations.

## 6. ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

The Suggestions and Concerns Register is a portal within the companies intranet that enables concerns to be communicated to the Company.

Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. This is available and accessible to all employees.

## 7. SAFEGUARDS

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this directive, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

## 8. COMMUNICATION AND AWARENESS OF THIS DIRECTIVE

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

## 9. REVIEW

This Anti-Slavery and Human Trafficking directive will be reviewed by the Company at least annually, at the start of each Marchwood Power Limited financial year.

## 10. 2024 ACTIONS COMPLETED

The following are the actions completed within the covered period:

| Area | Action | Status |
|---|---|---|
| Timeframe | Statement adopted for last financial year | Complete |
| Timeframe | Statement backward looking in review | Complete |



**Marc Rudd**
Chairman



**Alan Ainsworth**
General Manager