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HUMAN SLAVERY STATEMENT

Introduction

This statement sets out VWS Westgarth Ltd actions for its staff, to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring there is no human slavery involved directly in our own own business and minimising all practicable risks of human slavery in our supply chains, which support our business. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024.

As part of our role in the upstream, offshore water treatment market, we recognise that we have a responsibility to take a reasonably robust approach to preventing slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensure that our supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of VWS Westgarth Ltd and its staff:

- The business provides bespoke seawater and produced water equipment to offshore operators and also provides a range of complementary after-sales support services to such customers and their installations.

The organisation currently operates in the following countries:

- VWS Westgarth Ltd design and build activities are executed on a global basis through global supply chains. Execution activities are focussed in the Middle East, Brazil and Asia. Likewise its services are supplied world wide to customers in these regions including West Africa and Guyana. The work is coordinated from its head office in Scotland and other regional support offices in England, Angola and Brazil.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- VWS Westgarth Ltd demands that all its suppliers issue a conformity statement indicating that they do not support nor are involved with any forms of human slavery.
- Where a company does not have a conformity statement in place, for suppliers to become/remain approved, they are requested to comply with VWS Westgarth Ltd's requirements as defined with our supplier questionnaire anti-slavery requirements. This is supported through its standard conditions of purchase used for all sub-contracted work activities and procured equipment/services.
- When supplier audits are performed, the accuracy of the statements received through the supplier questionnaire process are assessed and verified.

The following activities are considered to be at high risk of slavery or human trafficking:

- VWS Westgarth Ltd regularly undertakes verification steps of its key suppliers but also recognizes their own supply chain, particularly in countries in Asia, Brazil and Africa, present the most severe risk.

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

Policies: The Company's policies in place are

- A high level **Risk Assessmen**t has been completed analysing how we assess risk in our supply chain.
- **Investigations/due diligence:** Our '*Supplier Questionnaire*' is reviewed by:
    - Procurement
    - QA
    - Finance
    - HSE

Training:
We require all staff within our organisation to complete training on modern slavery as a module within our wider human rights/ethics/ethical trade training programme.

- Understand and work towards compliance with the Modern Slavery Act 2015
- Understand what slavery is and various forms that the modern slavery umbrella term covers
- Learn what your organisation can do to help get rid of slavery in the UK

Relevant policies:
VWS Westgarth Ltd 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:

- **Whistleblowing policy (00000-KP-00032)** VWS Westgarth Ltd encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation'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 use our confidential helpline.
- **Ethics Guide (00000-KP-00033)-** Veolia's Ethics Guide makes it clear to employees the actions and behaviour expected of them when representing the organisation. VWS Westgarth Ltd strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.

- **Supplier/Procurement code of conduct:** Through the supplier questionnaire process, we verify that our Suppliers have established a code of conduct or code of ethics or series of policy documents that constitute a code of conduct for their organisation which is inline with our own expectations.
- Where a supplier has not developed the code of conduct policy or associated policy documents, we either request that the supplier and their sub-suppliers comply with our own policy requirements or we refrain from allocating any business to the supplier.

- **Recruitment/Agency workers:** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency. All recruitment agencies are required to share their Human Slavery Policy and Procedures with the organisation.
- **Anti Corruption Code of Conduct(00000-KP-00034)** -This Code of conduct (the "Code") describes the principles and acts aimed at complying with the Group's commitment to forbid, without any reservation, any form of corruption and assimilated or equivalent behaviors and to comply with regulations and best practices in this matter.

Due diligence:

VWS Westgarth Ltd undertakes due diligence when considering taking on new suppliers, and reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking, though this is not formally recorded;
- evaluating the modern slavery and human trafficking risks of each new supplier through the supplier questionnaire;
- a periodic review of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments mainly through qualified VWS Westgarth Ltd auditors, although third party auditors may be used, to assess the code of conduct and anti-slavery/human trafficking policy documents

Performance indicators:

VWS Westgarth Ltd has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- requiring all staff/staff working in supply chain management and HR to have completed training on modern slavery by October 31st 2023.

Training:

Ultimately, VWS Westgarth Ltd requires all staff within the organisation to complete training on modern slavery as a module within the organisation's training programme.

The organisation's modern slavery training covers :

- Understand and work towards compliance with the Modern Slavery Act 2015

- Understand what slavery is and various forms that the modern slavery umbrella term covers
- Learn what your VWS Westgarth Ltd can do to help get rid of slavery in the UK

Awareness-raising programme:
As well as training staff, the organisation has raised awareness of modern slavery issues by sharing the modern slavery statement on the internal intranet with all other related documentation being shared.

Approval:
This statement was approved on 6 June 2023 by VWS Westgarth Ltd Managing Director, Company Secretary and Head of HR, who review and update it annually.

Managing Director's signature:

Mr D Sheldrake.



Company Secretary's Signature:



Mr Christophe Laroche

Head of HR:

Mrs Victoria Kinchington Signature:



Date: 15 June 2023