



MODERN SLAVERY STATEMENT

FOR THE YEAR ENDING 31 DECEMBER 2021

INTRODUCTION

This statement is made by Doosan Power Systems S.A. and sets out the steps that Doosan Power Systems S.A. and its subsidiaries have taken and is continuing to take to ensure that modern slavery or human trafficking is not occurring within our business or supply chains.

This statement applies to Doosan Power Systems S.A. and its subsidiaries as specified below (“We” or “the Company” or “Doosan”):

- Doosan Babcock Limited
- Doosan Power Systems Overseas Investments Limited
- Doosan Babcock Energy Services (Overseas) Limited .

Modern slavery is a serious crime and a gross violation of fundamental human rights. Doosan has a zero-tolerance approach to modern slavery and is unwaveringly committed to preventing slavery and human trafficking in all our corporate activities. We are also committed to ensuring there is transparency in our own businesses and in our approach to tackling modern slavery throughout our supply chains and this stance is consistent with our disclosure obligations under the UK Modern Slavery Act 2015 and equivalent laws in other countries.

In this Statement we outline the steps we have taken in the last twelve months and our plans to implement measures for 2022/2023 to promote ethical business practices and policies that protect workers from abuse and exploitation.

OUR ORGANISATION STRUCTURE

We are a company incorporated in Luxembourg with a registered office in the UK. We are part of a group of companies headed by Doosan Enerbility Co., Ltd. We have international presence and subsidiaries or registered offices in Europe, the Middle East and Asia.

We are an engineering, construction and services company engaged in the power, chemical, industrial, pharmaceutical and oil & gas sectors. Among our UK subsidiaries is Doosan Babcock Limited.

Doosan Babcock Limited:

- is a specialist in the delivery of engineering, aftermarket and upgrade services to the energy sector
- is one of the leading providers of advanced efficient boilers and biomass conversion technology
- has been a major supplier to the nuclear industry for over 65 years

OUR SUPPLY CHAINS

Through our subsidiaries we are engaged in business projects worldwide. However, we predominantly service our business activity from within the UK and the EU which we consider to be low risk territories. Our supply chains consists of subcontractors, consultants, product and material suppliers, service providers, joint venture and alliance agreement partners. Nevertheless, we do recognise it is our responsibility to prevent any form of modern slavery practices wherever we conduct our activities.

We continue to carry out robust supplier due diligence pursuant to responsible procurement policies and conduct pre-contract checks using strict criteria to ensure our suppliers and subcontractors share Doosan’s commitment to fair business practices with honesty and transparency.

POLICIES & PROCEDURES

THE CODE OF CONDUCT

Our and our parent company's business model is driven by the "Doosan Credo" a set of core values underpinning Doosan's business activities.

The Doosan Credo encompasses our philosophy about people and business and is embedded in the Doosan Code of Conduct ("**Code**") which is designed to serve as a set of guiding principles governing the behaviours and practices of our company, our subsidiaries and all of our employees.

The Code promotes honest, transparent and fair business practices with our clients, suppliers, subcontractors and other third parties.

In general, the Code mandates that Doosan employees comply with all existing laws and regulations including the Modern Slavery Act 2015. It includes a policy on Corporate Culture that prohibits any form of abusive practices by the company and its employees. It further includes Integrity, Anti-Competition and Anti-Bribery policies which enforce Doosan's mandatory principles of honesty and fair business practices.

CORPORATE SOCIAL RESPONSIBILITY

The Company has adopted a framework policy on Corporate Social Responsibility promoting fair and responsible dealing by Doosan and highlighting its commitment to contribute to the economic development and enhancing the quality of life of its employees, local communities and society. Such policy was updated to include specific reference to the modern slavery legislation.

MONITORING

Through consistent monitoring and inspection, Doosan ensures that all its work sites are free from illegal and modern slavery practices.

REPORTING

Doosan continues to have in place a system for internal reporting related to status of work, working conditions on site, inspections of work and production areas as well as assessments of the performance and compliance of suppliers and subcontractors with its contracts and legal requirements. Doosan has in place a Whistleblowing policy that encourages its employees and other interested parties to report violations of the Code and existing laws and regulations to Doosan's designated Code of Conduct Manager.

Doosan's Whistleblowing policy complements its openness and transparency principles so that every Doosan employee will not be deterred or discouraged from reporting any violation or breach by any person.

DUE DILIGENCE

Key to our commitment to fair and ethical business practices is the proper identification and mitigation of any risk of modern slavery incidents occurring within our Company or supply chains. Such identification and mitigation of risk is done through our due diligence processes and procedures.

OUR SUPPLIERS

Supplier Compliance Policy

As set out above, we maintain robust due diligence processes and procedures for engagement of suppliers. Before any new supplier can be considered for inclusion on a bidders' list, the supply chain partners are requested to review our Supplier Compliance Statement ("**Compliance Statement**") and confirm whether their organisation complies with all applicable laws, statutes, regulations, and codes relating to these areas in all jurisdictions in which they operate, taking a zero-tolerance approach to bribery, corruption, child labour, modern slavery, human trafficking or unlawful discrimination. Suppliers are not eligible to conduct any business with Doosan unless they accept and comply with the Compliance Statement.

Any evidence of breach of the Compliance Statement by a supplier or subcontractor will lead to the termination of commercial relations.

Supplier re-qualification

We continue to retain a preferred list of reputable suppliers and subcontractors which have a proven track record of integrity, honest behaviour and fair business practices.

However, our existing suppliers must be re-qualified on a regular basis. During supplier re-qualification suppliers are requested to disclose details of breaches within the past 5 years relating to the following: Core International Labour Organisation (ILO) Conventions, UN Declaration of Human Rights, national laws including without limitation anti-bribery and modern slavery legislation.

Standard forms of contract

Doosan's standard supplier contracts require its suppliers and subcontractors to comply with existing and applicable laws and regulations which include compliance with the Modern Slavery Act 2015. These further contain clauses providing for the obligations under the Anti-Bribery Act 2010 and enforcement and termination clauses in case of violation by the supplier or subcontractor.

OUR CUSTOMERS

Our customers are predominantly large, reputable and well-established companies with robust corporate governance and social responsibility policies and procedures ensuring alignment with Doosan's Code of Conduct and fair business practices.

RISK ASSESSMENT & MANAGEMENT

We predominantly carry out business in the UK and the EU. However, we do carry out activities in the Middle East and Asia.

Modern slavery risks are present worldwide but not all countries have adopted the same strict measures to combat modern slavery and not all companies have implemented the necessary policies

and procedures. With this in mind, the Company identified the need to conduct a “mapping exercise” in relation to its business activity and supply chains in order to identify any risks and room for improvement or enhancement of the existing policies and measures in place. Such mapping exercise also includes a country risk assessment in accordance with the findings in the Global Slavery Index. This initiative is in the process of being formalised.

RAISING AWARENESS & TRAINING

Previously, Doosan has carried out a mandatory training on the company’s Code re-emphasising the key principles and compliance requirements. Training is actively monitored by the Human Resources Department in coordination with Doosan’s Code of Conduct Manager.

Periodically, Doosan reviews and improves its training courses to reflect changes in the law, technology and business practices.

In addition, within Doosan Babcock’s membership of a globally recognised anti-bribery and compliance association, all employees have access to online courses which cover key compliance issues, including fair employment practices, introduce employees to the law and set out how to take appropriate action when faced with a potential issue.

It is imperative that we keep people up to date with their obligations in terms of our Code of Conduct, need to remain vigilant and duty to report wrong-doing, or suspicion of wrong-doing. Recovery from the Covid19 pandemic and the current corporate restructuring, has impacted our ability to implement training, however, we continued to build knowledge among our employee networks, taking an integrated approach to human rights awareness and capacity building.

OUR PLANS FOR THE FINANCIAL YEAR 2022

Doosan wishes to further strengthen its commitment to fight modern slavery in the financial year 2022 and intends to:

- continue to raise awareness via circulation to all employees of developments in anti-modern slavery practices
- review its Code and relevant policies to ascertain whether there is any need for update to include more robust and modern slavery-specific provisions.
- form a task force team of and/or coordinate actions between representatives from the Procurement, Legal, Risk, HSE, HR and any other relevant functions to carry out a further risk assessment of the Company’s activities per country with the aim to improve and/or enhance the existing policies and procedures in place, if deemed necessary or appropriate.

We will continue our current efforts on staff training and supplier assessments, various inspections and coordination with local authorities to ensure that we are doing what we can to help and actively contribute to the global fight against modern slavery.



This statement is made in accordance with section 54(1) of the UK Modern Slavery Act 2015 and constitutes Doosan Power System S.A's modern slavery and human trafficking statement for the financial year ended 31 December 2021.

Approved by the Board of Directors of Doosan Power Systems S.A. on 30 June 2022.

A handwritten signature in blue ink, appearing to read "Kang SJ".

Suk Joo Kang
Chief Executive Officer