Material Solutions Limited

Modern Slavery Act Statement

Financial Year Ended 30th September 2024

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 (the "Act") and sets out the steps which Material Solutions Limited (part of the Siemens Energy Group) 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.

During the financial year ending 30th September 2024, Material Solutions Limited continued to follow Siemens Energy group global guidelines and codes of conduct, including the Siemens Energy Business Conduct Guidelines, the Siemens Energy Code of Conduct for Suppliers, and the Human Rights Policy and Code of Conduct for Sustainability.

Our Commitment

Material Solutions Limitedfully supports the aims of the Act and 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.

Material Solutions Limited is committed to embracing and supporting, within its sphere of influence, the set of core values in the areas of human rights, labour standards, the environment, and anti-corruption included in the United Nations Global Compact (UNGC), as an integral part of its business strategy and operations.

Sustainable practices are firmly anchored in our corporate culture, based on our company values of caring, respectful, and accountable. We apply globally binding principles that require all employees and managers to behave in an ethical, law-abiding manner. We act responsibly to support economic, environmental and social progress.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Code of business conduct

All employees are required to comply with our Business Conduct Guidelines which commits each to respect the personal dignity, and personal rights of every individual, as well as to act with integrity and in accordance with the law.

Our Business Conduct Guidelines require that our employees recognise and apply globally relevant anti-slavery principles, including the International Labour Organisation's Tripartite Declaration of Principles, and its Declaration on Fundamental Principles and Rights at Work, in particular in respect to the elimination of child labour, abolition of forced labour, prohibition of discrimination, and rights to freedom of association and collective bargaining.

Each employee is required to sign a statement that they have read and understood the Business Conduct Guidelines as part of our recruitment process.

We also expect our suppliers and business partners to share our values and to comply with all applicable laws as laid out in the Suppliers' Code of Conduct.

Policies which were issued recently include:

- The Human Rights Policy Statement, in line with the German Supply Chain Due Diligence Act: Human Rights Policy Statement
- Updated Sustainability in the Supply Chain Code of Conduct: Sustainability in the Supply Chain
- Updated Suppliers' Code of Conduct: Supplier Code of Conduct

Compliance policy

This globally binding all-encompassing compliance policy sets out the organisation's stance on Anti-Corruption, Anti-Trust, Anti Money Laundering, Data Protection, Human Rights and Export Control.

The global policy specifically highlights the need to comply with local law and thereby the requirements of the Modern Slavery Act. In particular, it requires all business units and employees to act always in accordance with the United Nations Global Compact principles.

Link to information about the Siemens Energy Compliance Programme:
https://www.siemens-energy.com/global/en/company/about/compliance.html

Speak Up

The "Speak Up" hotline for reporting compliance violations in a secure manner, 24 hours a day, 7 days a week, in thirteen languages is available to employees, customers, suppliers and other stakeholders online or via telephone. Reports can be made anonymously. The "Speak Up" system is managed by a third-party supplier.

Employees who report compliance violations at Material Solutions Limitedare protected by guidelines which prohibits retaliatory sanctions for reports are made in good faith.

In addition, the external and independent Siemens Energy Ombudsperson is available for the reporting of compliance violations.

Link to Speak Up hotline: Reporting Channels „Speak Up" and Ombudsperson

Recruitment Policy

Material Solutions Limited operates a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Our suppliers

Siemens Energy globally has a substantial and complex supply chain with around 30,000 suppliers across 139 countries. With such a large and geographically dispersed supplier network, Siemens Energy ensures a higher priority is given to those suppliers deemed high risk and has implemented a system of interconnected processes and tools to manage this complexity under the governance of our Global Supply Chain Management function.

Transparency and awareness of supply chain risks is ensured via a three-step process:

- Definition of sustainability risks and categories;
- Identification of the relevant suppliers;
- Development and implementation of necessary procurement processes to cover these risks for example by conducting on-site audits.

We support all our suppliers through our recently updated "Sustainability in the Supply Chain" and "Siemens Energy Code of Conduct for Suppliers and Third-Party Intermediaries" brochures, and the basis of all our supplier relationships is the commitment of our suppliers to observe the principles of the code.

Partners are required to pay heightened attention to ensuring respect for the human rights of specifically vulnerable groups, such as women, children or migrant workers, or (indigenous) communities. Specifically, Siemens Energy expects its partners to respect the fundamental employment rights set out in international conventions of the United Nations (UN) and the International Labor Organization (ILO).

We demand the elimination of all forms of forced labour and our partners must contribute to this by implementing appropriate measures and control mechanisms – not only within their own organisation but also in their supply chains, such as when using labour brokers, temporary employment agencies and the like.

We expect our partners to:

- Neither use nor contribute to slavery, servitude, forced or compulsory labour and human trafficking.
- Implement equivalent control mechanisms in their own supply chains.

In addition, we explicitly encourage them to extend these values further into their own supply chain in order to create a network of interactions and business relations that are built on trust.

Suppliers commit to the code by signing the Corporate Responsibility contract clause as part of the onboarding & qualification process, and also for all new and extended procurement contracts, via the Corporate Responsibility declaration or by acknowledging the Conditions of Purchase.

Prior to selection, all suppliers undergo various due diligence checks. Suppliers deemed high-risk are required to complete a Corporate Responsibility Self-Assessment (CRSA). This questionnaire enables suppliers to assess whether they meet the requirements of our Code of Conduct. This process raises awareness of these requirements, identifies potential risks in connection with sustainability at an early stage, and ensures that appropriate steps are taken.

Following selection, suppliers are regularly monitored and risk assessed, particularly those operating in higher risk countries. Suppliers for whom certain potential sustainability risks have been identified or where there are suspicions of non-compliance with the code of conduct are subjected to an in-depth assessment by audit experts on site. To ensure independent reporting, this assessment is carried out by external service providers.

Consequences of non-adherence
If our sustainability self-assessments or audits reveal infringements of our requirements, they must be remedied by the suppliers in question within a reasonable period of time. As well as follow-up audits carried out by our external audit partners, the responsible procurement units and the suppliers involved directly agree on the corrective actions defined during our audits. We reserve the right to end the supplier relationship in the event of serious infringements, such as evidence of slavery, servitude, human trafficking and forced labour.

Employee Training
Material Solutions Limited makes available several online training modules, such as “Sustainability in the Supply Chain” and “Correct Purchasing” for our employees. This training is mandatory for all employees with purchasing responsibility and highlights the importance of the “Siemens Energy Code of Conduct for Suppliers and Third-Party Intermediaries”. Completion forms part of an employee’s annual performance targets and therefore subject to formal monitoring.

Know-How Transfer and Building Competence
Our suppliers' commitment to comply with our sustainability principles is most effective when it is based on their own convictions. We are therefore committed to building their competence and intensifying knowledge transfers related to sustainability. As a supplement to existing programmes, an online sustainability training has been developed specifically for suppliers' staff cooperating with Material Solutions Limited in supporting with deliveries/services.

Our Commitment

Material Solutions Limited will not tolerate any violations of applicable law – and if it does happen, we will take strong action. We continue to apply a zero-tolerance approach to forced labour, slavery and human trafficking in any form, in our business and supply chain.

Approval for this statement

This statement was approved by the Board of Directors with respect to the Financial Year ending on 30th September 2024.



28 Jan, 2025 2:35:28 PM GMT

Darren Davidson (Director)



28 Jan, 2025 1:22:01 PM GMT

Ross Dean (Director)

Date _____