

Anti-Slavery, Human Trafficking and Child Labour Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking (“modern slavery”), all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Eneraqua Technologies plc has a zero-tolerance approach to modern slavery and child labour within its business and supply chains.

Scope

This policy applies to all persons:

- Employed by Eneraqua Technologies plc, Cenergist Limited, Welltherm Drilling Ltd, GS Drilltech Ltd, Luxe Lights Ltd, Cenergist Spain SL, Cenergist Energy Private Ltd (India), HaGePe International BV, HaGePe Exploitatie BV, HL2024 Shop BV, Cenergist BV, Control Flow Technologies Ltd, Energy Water Services Ltd, Installatiebedrijf Vriend B.V., Matthewson Holdings Limited, Matthewson Limited, and Cenergist Scotland Limited referred to as “the Group”.
- Working for us or on our behalf in any capacity, including employees at all levels and positions, whether permanent, fixed-term or temporary including, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives, and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

OUR COMMITMENT

The Group is committed to:

- conducting our business operations in a manner that complies with applicable laws and regulations.
- acting ethically and with integrity in all our business dealings and relationships.
- implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains; and
- ensuring there is transparency in our approach to tackling modern slavery in our business and our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- taking steps to ensure that slavery, human trafficking and child labour is not taking place in any part of our supply chain or in any part of our business.

RESPONSIBILITY FOR THE POLICY

The Board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Financial Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

PARTNERS

We expect the same high standards from all our Suppliers. As part of our contracting process, we include specific prohibitions against modern slavery and child labour, and we expect that our Suppliers will hold their own suppliers to the same high standards.

IDENTIFYING MODERN SLAVERY

Modern slavery may be found in:

- our business;
- our supply chains; and
- outsourced activities, particularly to jurisdictions that may not have adequate modern slavery safeguards.

There is no typical victim of modern slavery, and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a victim of modern slavery or human trafficking.

The person

- is not in possession of their own passport, identification, or travel documents.
- is acting as though they are being instructed or coached by someone else.
- allows others to speak for them when spoken to directly.
- is dropped off and collected from work.
- is withdrawn or appears frightened.
- does not seem to be able to contact friends or family freely.
- has limited social interaction or contact with people outside of their immediate environment.

The above list is not exhaustive. A person may display several the indicators set out above, but they may not necessarily be a victim of slavery or trafficking.

Child Labour

Child labour is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO). The term “child labour” is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and

mental development. Whether or not a particular form of “work” can be called “child labour” depends on the child’s age, the types and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries.

REPORTING CONCERNS

If you are unsure whether the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager, or if you’re a supplier with your Group contact. If you think that someone is in immediate danger, dial 999.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. 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.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand, and comply with this policy.

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

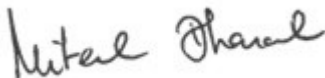
You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

Breach of policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Monitoring Our Procedures

We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.

Signed		Date	5 July 2023
Name	Mitesh Dhanak	Position	Chief Executive Officer