

## Modern Slavery and Human Trafficking Statement

This statement applies to Eneraqua Technologies plc and includes all subsidiary companies; 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 Ltd, Matthewson Ltd, and Cenergist Scotland Ltd referred to as “the Group”.

It continues to be a priority for Eneraqua Technologies plc to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement focuses specifically on the Group’s compliance with the Modern Slavery Act 2015 and highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain.

### Organisation's Structure

We design and deliver energy and water efficient systems in the heating and renewable energy and construction sectors. We are the parent company of the Group which has over 160 employees and operates in the UK, Spain, the Netherlands and India.

### Our Supply Chains

Our supply chains include sub-contractors and suppliers of products and goods.

### Our Policies on Slavery and Human Trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We review these policies on a regular basis.

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We also have the following policies in place relevant to modern slavery;

- Code of conduct
- Whistleblowing policy
- Bullying and harassment policy
- Diversity and inclusion policy
- Recruitment and selection policy

### Due Diligence Processes for Slavery and Human Trafficking

We understand that the areas that give rise to the highest modern slavery risks include our geographical location and the sector in which we work.

As part of our initiative to identify and mitigate risk we undertake the following procedures:

- Employees

We verify that all employees have the right to work in the country in which they are based upon commencement of their employment. We make all employees aware of their working hours, leave and absence entitlements and other employment benefits by providing them with written confirmation of their terms and conditions of employment.

All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to in all countries of operation, without any unauthorised deductions.

- Sub-contractors

We require subcontractors to ensure their employees have the right to work in the country in which they are based. We review sub-contractors' approaches to employee rights and any breaches of human rights related legislation during our selection process. We request copies of their Modern Slavery and Human Trafficking policies (as appropriate) for our records.

We ask all sub-contractors that purchase materials for use on our sites to consider the risk of modern slavery and to make a commitment to ensure that there is no slavery or trafficking in their supply chain.

- Suppliers

The Group recognises the importance of the supply chain and values role they play in delivering our purpose. We use a variety of methods to undertake due diligence on each of our partners to ensure we are working with companies who share our values and who are committed to the highest possible ethical and business standards. The Group applies the following criteria to all prospective and existing partners, failure to comply can result in material consequences, including the termination of any existing relationship with them.

- No forced labour or human trafficking is practiced.
- Employment is freely chosen.
- Employees have safe and hygienic working conditions.
- No discrimination is practised.
- Working hours are not excessive.
- A fair wage is paid.
- No harsh, cruel, or degrading practices are allowed.

We have recently improved our procurement practices, hiring an expert in procurement who has reviewed our supplier processes and is focused on delivering sustainable procurement processes.

### **Training**

To ensure understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all employees are briefed on the Company's Modern Slavery and Human Trafficking policy as part of their induction, with some key employees required to undertake an e-learning module on the subject. Should any of our colleagues need any additional information or support about human trafficking, forced labour, servitude, and slavery this will be provided.

### **Whistleblowing**

All employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through the Group whistleblowing procedure.

Our whistleblowing policy and procedure is available to all employees and third parties working with the Company and allowing either party to raise a concern in confidence. The Group is committed to protecting employees when disclosing points of concern and will ensure all disclosures made in good faith will be treated confidentially and without fear of retaliation.

**Next Steps**

Following a review of the effectiveness of the steps we have taken this year in relation to no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

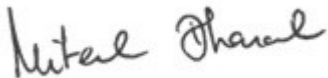
- Further enhance our procurement processes ensuring that all acquisitions are fully integrated.
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**In summary**

We participate in the UK Government Registry of Modern Slavery Statements. This statement is registered and will be reviewed and updated as necessary at least on an annual basis. We will continue to review our measures for further enhancement to reflect any future UK legislative changes. Accountability for compliance with this statement rests with the Executive Board.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes Eneaqua Technology's slavery and human trafficking statement in respect of its financial year ended 31 January 2023.

Signed for, and on behalf of, the Board:



**Mitesh Dhanak, Chief Executive Officer**  
**Eneaqua Technologies plc**

5 July 2023