

SEGEN MODERN DAY SLAVERY STATEMENT 2017/18

This statement has been published in accordance with the Modern Slavery Act 2015. It outlines the steps taken by Segen during the year ending 30th November 2018 to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

We know that modern slavery and human trafficking is a global and growing issue given the rapid rise in global migration. No sector or industry can be considered immune. As part of the global solar industry Segen recognises that it has a responsibility to take a robust approach to human trafficking and slavery. The company is committed to preventing slavery and human trafficking in its corporate activities and to ensuring its supply chain is free from slavery and human trafficking.

Our Business and Supply Chains

Segen Ltd is one of the UK's leading wholesalers of Solar Photovoltaic (PV) equipment to installers via its online portal both in the UK and internationally. Segen trades via its online portal which allows customers to design their PV system, place an order and receive goods the next day. Our supply chain is varied and widespread with relationships with over 30 suppliers sourcing 1,000's of product lines from across the globe.

The business currently operates from offices in the following countries

- UK
- Germany
- South Africa

There are no activities that are considered to be at high risk of slavery or human trafficking. Through our direct and long-standing relationships with suppliers the business will ensure that, in so far as is possible, all suppliers also adhere to the Modern Slavery Act 2015.

Relevant Company Policies

- **Employee Code of Conduct:** The company code makes it very clear to employees the actions and behaviour expected of them when representing the company. The company expects consistency and the highest standards of employee conduct and ethical behaviour.
- **Supplier/Procurement Process:** Suppliers are required to demonstrate that they provide safe working conditions where necessary. As part of the supply chain selection process all potential and existing suppliers are required to complete a Supplier Questionnaire to assess their suitability as a supplier.
- **Recruitment Policy:** The recruitment policy is compliant to all EU and UK legislation, including the minimum wage and therefore is not at risk of slavery and human trafficking.

Due Diligence of Suppliers and Supply Chain

The organisation undertakes due diligence when considering taking on a new supplier and regularly reviews its existing suppliers. We have over 30 suppliers based across the globe, most of whom we have been working with for over 10 years. These relationships will continue to be nurtured and we remain committed to responsible sourcing.

Performance Indicators

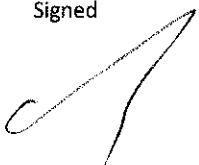
In light of the introduction of the Modern Slavery Act 2015 the organisation will:

- Ensure relevant employees understand fully the implications of the Modern Slavery Act 2015.
- Introduce actions to strengthen supply chain auditing and verification
- Take measures to increase supplier engagement and awareness of modern slavery and human trafficking.

Board Member Approval

This statement was approved by the Segen Ltd Board of Directors

Signed



Andy Pegg
CEO, Segen Ltd
November 2018