

SEGEN MODERN DAY SLAVERY STATEMENT 2021/22

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 2021 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 within our Segen businesses.

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 which includes specific questions related to modern day slavery.
- **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.



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Due Diligence of Suppliers and Supply Chain

- We have been working under the constraints of a global pandemic which has limited our ability to travel to our manufacturers factories, so to mitigate risk we have improved our supplier questionnaire – both in terms of increased due diligence in the questions and in follow up actions where noncompliance is suspected.
- Where supplier responses to our questionnaire caused concern, we followed up with meetings to discuss and determine future plans to tackle up stream suppliers.
- Recently Segen has been acquired by Labora which gives opportunities in terms of local auditors with whom we are setting out a programme of factory visits and audits on our Chinese manufacturers.
- We are aware that materials that go into some of our products are sourced from high-risk regions in China and this gives heightened responsibilities, to mitigate this risk we will use our local auditors in China to perform factory visits on our suppliers.
- During 2020/2021 we have increased our supplier base, taking on a new EV charging category into our portfolio. This has proved challenging in terms of a global microchip shortage but has not meant that we have not completed our due diligence into modern day slavery.

2020/2021 activities

- Segen are the only PV distributor to sponsor the Solar energy UK project to create a report and co-ordinated action plan on supply chain sustainability including modern day slavery.
- We are planning a 2-day training course for our buyers on ethical procurement which includes modern day slavery, with the aim to help them understand how to determine whether supplier responses to our questionnaire are sufficient.

Board Member Approval

This statement was approved by the Segen Ltd Board of Directors

Signed



Jason Howlett UK MD, Segen Ltd November 2021



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