

SEGEN MODERN DAY SLAVERY STATEMENT 2022

This statement has been published in accordance with the Modern Slavery Act 2015. It outlines the steps taken by Segen during the year ending 31st December 2022 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 the UK's leading wholesalers of Solar Photovoltaic (PV) and Energy Storage 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 50 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.

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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info@segn.co.uk



+44 (0) 0330 9000 141

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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 this potential 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 Supplier Questionnaire has caused concern, we have followed up with meetings to discuss and determine future plans to tackle up-stream suppliers.
- We are aware that materials that go into some of our products are sourced from potentially high-risk regions in China and this gives heightened responsibilities, and so to mitigate this risk we will use our local auditors in China to perform factory visits on our suppliers.
- Our long-standing relationship with suppliers and the continued requirement for suppliers to complete our Supplier Questionnaire, gives the business comfort that its suppliers also adhere to the Modern Slavery Act 2015.

2022 Activities

- We have amended our Supplier Questionnaire to identify YOY changes to supplier policy but additionally with a focus on understanding supplier employee mix, upstream supplier Modern slavery compliance and increased traceability.
- We will execute a supplier wide revisit of the Supplier Questionnaire during the first half of 2023.
- We have also partnered with a 3rd party factory audit company based in Shanghai who will visit and audit factories on our behalf. The global pandemic is still restricting us in this area but so far, we have audited both our biggest module supplier and inverter supplier with a view to extending the process to all tier one suppliers over the next 12-18 months.
- The results of these audits have been encouraging and offer insights into employee engagement and management practices but also quality controls, and upstream supplier compliance.
- We conducted a 2-day training course for our buyers on ethical procurement which included modern day slavery, with the aim to help them understand how to determine whether supplier responses to our Supplier Questionnaire are sufficient.
- 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.
- Segen are co-sponsors of the brand-new Solar Stewardship initiative, whose mission is to further develop a responsible, transparent, and sustainable solar value chain and works towards ensuring the energy transition is just, inclusive and respects human rights.



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Board Member Approval

This statement was approved by the Segen Ltd Board of Directors

Signed



Jonathan Doochin
CEO, Segen Ltd
January 2023



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