

SEGEN MODERN DAY SLAVERY STATEMENT 2023

This statement has been published in accordance with the UK Modern Slavery Act 2015. It outlines steps taken by Segen during the year ending 31st December 2023 to prevent against modern slavery and human trafficking in its business and supply chains.

Introduction

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 and Segen recognises that it has a responsibility to address 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 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

The renewables sector has been identified as an area of potential risk in our product portfolio due to the rapid increase in demand, the proliferation of products on the market and the complexity of the supply chain. Segen has been working closely with the supplier partners of solar panels specifically and has requested evidence of due diligence including mapping of the supply chains back to core raw materials. This is an ongoing focus area for supplier partner engagement.

Through our direct and long-standing relationships with suppliers, the business will use best efforts to ensure that all our suppliers adhere to the UK 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 in behaviours and the highest standards of employee conduct and ethical behaviour.



www.segen.co.uk



info@segn.co.uk



+44 (0) 0330 9000 141

**Renewables.
Delivered.**

- **Supplier Code of Conduct:** Suppliers must complete this document as part of the new supplier on-boarding process and suppliers must notify Segen of breaches including Modern Slavery.
- **Supplier/Procurement Process:** Suppliers are required to demonstrate that they provide safe working conditions throughout the supply chain. As part of the supply chain selection process and ongoing due diligence process, all potential and existing suppliers are required to complete a Supplier Questionnaire to assess their status/ suitability as a supplier, which includes specific questions related to modern day slavery.
- **Recruitment Policy:** The recruitment policy is compliant to all UK legislation, including the minimum wage and therefore is not at risk of modern slavery and human trafficking.

Due Diligence of Suppliers and Supply Chain

- To mitigate risk, our supplier questionnaire requests Suppliers to provide details & evidence of internal policies & procedures related to Modern Slavery.
- On receipt of the completed questionnaire and having reviewed the response, we will meet with the suppliers to discuss any findings and agree corrective action plans.
- We are aware that materials are embedded within 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.
- We will work closely with relevant supplier partners in findings ways to improve traceability of materials and to reduce this risk.
- Audit Process - Ensuring that our on-site audit process is more focused on Modern Slavery and what to look out for.
- Modern Slavery Training is revisited periodically to catch new employees and refresh the existing team.

2023 Activities and How We Intend to Improve In 2024

- We continue to partner with a 3rd party factory audit company based in Shanghai, who will visit and audit factories on our behalf. We have extended this process to our top strategic suppliers & plan to extend to the rest over the next 12-18 months. In addition, we have added more rigorous question sections in the areas of Modern Slavery & Occupational Health & Safety. The results of these audits have been encouraging and offer insights into employee engagement and management practices, as well as quality controls, upstream supplier compliance & traceability.



www.segen.co.uk



info@segn.co.uk



+44 (0) 0330 9000 141

**Renewables.
Delivered.**

- We plan to strengthen our supplier questionnaire and identify year on year changes to our supplier policy, with an additional focus on understanding supplier employee mix, upstream supplier Modern slavery compliance and increased traceability within our whole supply chain, not just our immediate suppliers. We will execute a supplier wide revisit of this questionnaire during the first half of 2024, as part of our planned supply chain compliance activities
- We will continue to constantly review our processes and intend to move to a third-party supplier assurance platform as the primary way in which we will assess, monitor and approve our strategic supply chain partners.
- Segen continue to be co-sponsors of the Solar Stewardship initiative, whose mission is to further develop a responsible, transparent, and sustainable solar value chain and works to ensure the energy transition is just, inclusive and respects human rights.

Board Member Approval

This statement was approved by the Segen Ltd Board of Directors

Signed



David Rice
Managing Director, Segen Ltd
December 2023



www.segen.co.uk



info@segn.co.uk



+44 (0) 0330 9000 141

**Renewables.
Delivered.**