

Segen Modern Day Slavery Statement

This statement has been published in accordance with the UK Modern Slavery Act 2015. It outlines steps taken by Segen during the financial year ending 31st March 2025 to prevent against modern slavery and human trafficking in its business and supply chains.

2025



Introduction

Segen Modern Day Slavery Statement

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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 distributors 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, Switzerland, United States of America.

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

Modern Slavery statement

Refreshed each year to include improvements that we are making in Modern Slavery detection techniques and reporting. As a multinational group this policy serves as a benchmark for all territories and is applied to all suppliers regardless of location. Mandates all persons working for Segen or on our behalf in any capacity, including our team members, supplier partners, agents, distributors, and all third parties to comply with the policy.

Employee Code of Conduct (updated 2025)

Our employee handbook makes it very clear to our 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.

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.

Health & Safety Policy

Aims to ensure the safety and welfare of team members, Visitors and people who are affected by Segen operations. By everyone playing a part the health, safety and welfare of all can be protected.

Supplier Code of Conduct

This has been updated and all Suppliers must complete this document as part of our new supplier due diligence framework. We expect all of our suppliers to have confirmed compliance with this document during 2025 & Suppliers must notify Segen of breaches including Modern Slavery & confirm compliance annually.

As of August 2025 – 58% of our purchased volume is procured under our Code of Conduct framework.

Due Diligence of Suppliers & Supply Chain

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- Segen Group Ltd has adopted the use of EcoVadis, the world's most trusted business sustainability ratings and ESG compliance solution. The platform provides a risk assessment lens for Modern Slavery for all our suppliers. We use this report as a KPI to track these assessments – by supplier, year on year.
- For our top tier and high risk suppliers we ask them to complete an Ecovadis assessment – the result of which delivers a scorecard and subsequent suggested improvement action plan.

As of August 2025 – 65% of our purchased volume is procured under an Ecovadis Rated scorecard.

- We also complete this process ourselves and in Aug 2025 achieved the rating of 60/100 an improvement of 20% YOY and illustrates our commitment to continuous improvement within Sustainability & Social Value and our supplier approach.

Risk, Audit and Transparency initiatives

- We are aware that materials are embedded within some of our products are sourced from high-risk regions of the world and this gives heightened responsibilities. To mitigate this risk, we will use local auditors to perform factory visits on our suppliers.
- Outside of supplier audits we are working closely with relevant supplier partners in findings ways to improve traceability of materials and to reduce this risk. ~During 2025 we have instigated a supply chain mapping project for our top tier suppliers and view to extend this to other high-risk suppliers over the coming 12 months.
- In March 2025, we published a company statement on responsible sourcing which directly addresses modern slavery concerns and how we mitigate them within the solar supply Chain.
- As members of the Solar Stewardship initiative, we continue to support their traceability standards within the solar supply chain. As of August 2025 – 7 supplier sites have been certified using the SSI's ESG Standard. This is to be extended to 12 sites by the end of the year.

• **As of August 2025 – 100% of our purchased volume is procured under an Ecovadis Modern Slavery Risk assessment (87 suppliers)**

Training

We brief our teams on all aspects of SSV including Modern Slavery. All Staff are expected to complete “working with the modern slavery act” training & in addition, our supply chain teams are regularly updated on Modern Slavery risks and the results/ progress of traceability initiatives.





Board Member Approval

This statement was approved by
the Segen Ltd Board of Directors

Signed: *S. Conday*

Spencer Conday
Managing Director, Segen Ltd
September 2025