

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 2024 to prevent against modern slavery and human trafficking in its business and supply chains.

2024



Introduction

Segen Modern Day Slavery Statement



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.**

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:

Our employee handbook makes 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.

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 will expect all of our suppliers to have confirmed compliance with this document during 2025 & Suppliers must notify Segen of breaches including Modern 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.

Health & Safety Policy:

Aims to ensure the safety & well being of our staff & visitors to our facilities.

Due Diligence of Suppliers & Supply Chain

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- In 2024, we have adopted the use of EcoVadis, the world's most trusted business sustainability ratings and ESG compliance solution. The platform provides a risk assessment focus for Modern Slavery for all our suppliers. The annual assessments via EcoVadis will enable us to track our suppliers progress against specific Modern Day Slavery criteria
- 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.
- 14 of our key suppliers have been assessed to date, each now with a recognised scorecard. We will continue to extend this into our broader supply chain during 2025 and beyond.
- We at Segen have also completed the EcoVadis process ourselves and in May 2024 achieved the rating of 50/100 – above average and awarded the status of committed which we intend on improving on in our 2025 re-assessment.
- 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 use local auditors to perform factory visits on our suppliers.
- In addition to supplier audits, we are working closely with relevant supplier partners in finding ways to improve traceability of materials and to reduce this risk.
- Modern Slavery Training is revisited periodically to catch new employees and refresh the existing team.

2024 Activities and how we intend to improve in 2025

Head of Supplier Compliance & Sustainability

In 2024, we have appointed the position of Head of Supplier Compliance & Sustainability. This role demonstrates our continued commitment to Social Value and Sustainability and is key to Segen driving forward on the important agenda of Modern Day Slavery and in being recognised as a responsible and leading distributor of Solar Photovoltaic (PV) equipment.

Solar Stewardship Initiative

Segen continue to be co-sponsors of the Solar Stewardship initiative, whose mission is to further develop a responsible, transparent, and sustainable solar supply chain and works to ensure the energy transition is inclusive and respects human rights.

Third Party Audit

We continue to partner with a 3rd party factory audit company based in Shanghai, who will visit and audit factories on our behalf. During 2024 we have widened the scope of our audits to include social value and enhanced traceability.

We believe this to have a material impact on Modern Slavery and Occupational Health & Safety beyond our immediate suppliers as we explore further up the supply chain, with the ambition to get right through to source material suppliers. This will be an additional KPI to measure the health and performance of our suppliers and their supply chains.

Ecovadis Platform

We will continue to leverage the use of the Ecovadis platform within our supply chain and will become a key KPI in how we work with our suppliers in 2025.



Board Member Approval

This statement was approved by the Segen Ltd Board of Directors

Signed: *S. Conday*

Spencer Conday
Managing Director, Segen Ltd
December 2024

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