

GENR8ing the future of cleantech innovation



Anti-slavery Policy



For more information visit www.ecogenr8.com

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Company number 7455556

VAT registration number GB112217371

Anti-slavery Policy statement

This Policy applies to all persons working for EcoGenR8 Limited and its trading divisions, AFECO and Innov8 Products (the Company) or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, agents, contractors and suppliers (**workers**).

This Policy takes into account, and supports the policies, procedures and requirements documented in the Company's Management Systems, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018. This implementation and operation of these management systems underlines its commitment to this policy.

It is the Policy of the Company to strictly prohibit the use of modern slavery and human trafficking in its operations and supply chain. The Company has and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within the Company or in any of its supply chains. The Company expects that its suppliers will, in turn, hold their own suppliers to the same high standards.

Further clarification

The term Modern Slavery is used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. This act is a crime and a violation of fundamental human rights.

The Company considers its exposure to modern slavery to be limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies good and / or services to it.

In the operation of its business, the Company's main supply chains are those related to the provision of goods and services. The Company considers its main exposure to the risk of slavery and human trafficking to exist in its supply chains.

Our commitment

The Company acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to preventing slavery and human trafficking within its own business and in its supply chains. The Company understands that this requires an ongoing review of both its internal practices in relation to its labour force and its supply chains.

The Company expects everyone working with it or on its behalf to support and uphold the following measures to safeguard against modern slavery:

- The Company has a zero-tolerance approach to modern slavery internally and in its supply chains. The Company will refrain from entering into business, and / or will discontinue any current business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.
- No labour provided to the Company in the pursuance or the provision of its own services is obtained by means of slavery or human trafficking.
- The Company offers employment contracts on a guaranteed hours basis only; no offers of employment are made on a zero hours basis.
- The Company is committed to addressing the risk of modern slavery in its operations and supply chain.
- The prevention, detection and reporting of modern slavery in any part of the organisation or supply chain is the responsibility of all those working for the Company or on its behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest a breach of this Policy.
- The Company takes a risk-based approach to its contracting processes and keeps them under review. The Company requires suppliers to comply with its code of conduct which sets out the minimum standards required to combat modern slavery and trafficking. This is relayed through our sub-contractor evaluation process as defined in our Outsourced Processes Procedure P006.
- All key supplier details are maintained on a register. In accordance with section 54(4) of the Modern Slavery Act 2015 the Company has contacted all approved sub-contractors to set out our Policy on modern slavery. To ensure effectiveness in combating modern slavery the Company ensures on an annual basis that the supplier register is accurate and as part of the Company's due

diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier.

- Consistent with the Company's risk-based approach its may require suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the code.
- As part of the Company's ongoing risk assessment and due diligence process it will consider whether circumstances warrant it carrying out audits of suppliers for their compliance with its code of conduct.
- If the Company finds that other individuals or organisations working on its behalf have breached this Policy, the Company will ensure that appropriate action is taken.
- Upon commencement of employment, all employees undergo a structured induction process during which all employees are made aware of the policies relating to standards of behaviour that it requires from them. The Company also provides training on awareness of modern slavery to those within the Company who have been identified as having responsibilities in this regard, namely those involved in finance, procurement and recruitment.

The Company also has a Corporate Social Responsibility (**CSR**) Policy which further defines its stance on modern slavery.

Employees responsibility

All employees have personal responsibility for the application of this Policy. It should be read and be familiarised with as part of each employee's induction and this Policy must be properly observed and fully complied with by all associated workers. Dedicated training is provided by the Company to ensure full understanding of the Modern Slavery Act which should be conducted annually by all workers.

The Company encourages whistleblowing to report any concerns regarding modern slavery and will investigate complaints thoroughly, as defined by its Whistleblowing Policy. Employees or others can report confidentially, any suspicion of modern slavery by emailing the Managing Director at afield@afeco.co.uk.

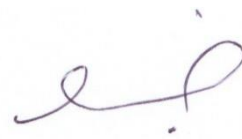
Review

This Policy applies to EcoGenR8 Limited and its trading divisions, AFECO and Innov8 Products. It is reviewed for each financial year.

This Policy relates to the 2020 / 2021 financial year.

I take full responsibility for ensuring the policy is implemented.

Approved by A. Field
Director
November 2020

A handwritten signature in purple ink, appearing to be 'A. Field'.