

Modern slavery and human trafficking policy and statement

September 2022

Contents

Foreword	3
Anti-slavery and human trafficking policy and statement.....	4
Purpose of this policy	4
Our supply chain – risk assessment.....	4
Our supply chain – management	4
Our policies.....	5
Embedding the principles	5
Reporting modern slavery	6
Key performance indicators.....	6
Communication and awareness of this policy	6
Review	6

Foreword

Hydro International is committed to high standards of ethical and governance arrangements in respect of impartiality, integrity and objectivity in our activities. We have a zero tolerance approach to modern slavery, and support the eradication of modern slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the geography in which they are based and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

This policy covers all the activities of Hydro International and its subsidiaries. It governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all who have, or seek to have, a business relationship with Hydro International and/or any member of our Group, to familiarise themselves with our anti-slavery policy and to act at all times in a way which is consistent with our anti-slavery policy.

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Paul Cleaver

Chief Executive

Anti-slavery and human trafficking policy and statement

Purpose of this policy

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. This document sets out the policy of Hydro International (the "Company") with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

As a Group, we have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

Our supply chain – risk assessment

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and we are continually evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

We build appropriate measures into our sourcing, supplier on-boarding and contract management processes, therefore minimising our exposure to risk. Using supply chain due diligence principles enables us to make a judgement on transactions and the integrity of our supply chain.

We aim to build relationships with our suppliers to ensure they comply with our values and that they are aware of our commitment to protect human rights and the environment. As part of our procurement processes, we require all of our suppliers to comply with the requirements of the Modern Slavery Act and include appropriate contractual obligations within all of our commercial agreements.

Our primary suppliers are based in jurisdictions with lower risk of modern slavery – UK and US.

The above procedures, and the inherent characteristics of our supply chain, lead us to assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chain – management

All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we implement the following measures:

- conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas
- engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses; Hydro International reserves the right to terminate any supply agreement, arrangement or other contract without compensation, if a supplier is found to have or found to be engaging in human trafficking and slavery or which refuse to co-operate with any audit to verify compliance with this Policy.
- where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
- introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

Our policies

We are committed to doing the right thing by ensuring we respect human rights and the environment. We manage a governance framework for all material focus areas within our sustainable framework and follow best practice guidelines.

The following policies are available to all staff through our intranet:

- Code of conduct
- Whistleblowing policy
- Harassment policy
- Equal opportunities policy
- Grievance policy

Embedding the principles

Ultimate responsibility for the Company's actions to prevent modern slavery rests with the Company's leadership. The board of directors of the Company has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

We expect everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in both our organisation and our supply chains. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.
- We are committed to training relevant employees in modern slavery, how to identify it in practice and how to respond.

- We are committed to engaging with our direct suppliers where possible to address the risk of modern slavery in our operations and supply chain.
- As part of our contracting processes, where we are able to negotiate the terms of supply we negotiate to include a specific prohibition against the use of modern slavery and trafficked labour and an ability to audit the supplier's organisation for compliance with this policy.
- Our recruitment procedures require employment and recruitment agencies and other third parties supplying workers to our organisation to comply with this policy.

Reporting modern slavery

Employees must notify their line manager, the HR Manager or the Company Secretary in accordance with the Whistleblowing policy as soon as possible if they have any reason to believe that modern slavery of any form may exist within our organisation or our supply chain or may occur in the future or have any concerns or suspicions relating to compliance with this policy.

If a person, other than an employee, has any reason to believe that modern slavery of any form may exist within our organisation or our supply chain, or may occur in the future or have any concerns or suspicions relating to compliance with this policy, they must notify as soon as possible their line Manager, the HR Manager or Company Secretary.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

Key performance indicators

Where potential modern slavery impacts are identified within a contract requirement, we will work with our suppliers to develop appropriate KPIs to monitor and manage performance in regard to these risks.

Communication and awareness of this policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Review

This Anti-Slavery and Human Trafficking Policy is reviewed by the Company's Board of Directors on a regular basis (at least annually) and may be amended from time to time.







Hydro International Modern slavery statement - September 2022

Final Audit Report

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