

GENR8ing the future of cleantech innovation



Anti-slavery Policy



For more information visit www.ecogenr8.com

EcoGenR8 Limited is registered in England at
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Waterlooville | Hampshire | PO7 7XN

Company number 7466668

VAT registration number 112217371

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.

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 our commitment to this policy.

It is the policy of the Company to strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our Company or in any of our supply chains. The Company expects that our suppliers will 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 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 the Company and 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 of 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.
- We are committed to addressing the risk of modern slavery in our operations and supply chain.
- 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 take a risk-based approach to our contracting processes and keep them under review. We require suppliers to comply with our 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 our risk-based approach we may require suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the code.
- As part of our ongoing risk assessment and due diligence process we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our code of conduct.
- If we find that other individuals or organisations working on our behalf have breached this Policy we will ensure that we take appropriate action.
- 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 and procurement.

The Company also has a Corporate Social Responsibility 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.

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

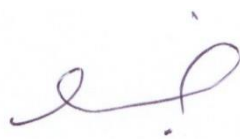
Review

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 2018 / 2019 financial year.

I take full responsibility for ensuring the policy is implemented.

Approved by A. Field
Director
November 2018

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