

## Modern Slavery Policy

Modern slavery as defined by the Modern Slavery Act 2015 is slavery, servitude, forced and compulsory labour, and human trafficking. This is a crime and an absolute violation of human rights.

Spaans Babcock Ltd has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business.

- Spaans Babcock Ltd will not knowingly benefit in any way from forced or involuntary labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise. All employees must be voluntary and have the freedom to terminate their employment, having completed an agreed notice period, without penalty.
- Spaans Babcock Ltd will not knowingly work with any Supplier, Subcontractor or Service Provider who charges workers recruitment fees. Workers should not be charged any fees or costs for recruitment, directly or indirectly.
- Spaans Babcock Ltd will not knowingly work with Suppliers, Subcontractors or Service Providers who retain worker's identity documentation or other valuable items, including work permits or travel documents (passports).
- Spaans Babcock Ltd will not knowingly work with Suppliers, Subcontractors or Service Providers who require workers to lodge deposits or bonds.
- Spaans Babcock Ltd will not knowingly work with suppliers who do not provide written contracts of employment detailing the employee rights and responsibilities, working hours, salary and other relevant employment conditions.
- Spaans Babcock Ltd will not knowingly work with Suppliers, Subcontractors or Service Providers who carry out "Contract Substitution" (where the contract with the employee does not match the contract the worker signed with the agent in the home county or country).
- Any Supplier, Subcontractor or Service Provider to Spaans Babcock Ltd must include provision of grievance mechanisms within their organisations in order that workers have a confidential and safe process for raising any concerns.
- Spaans Babcock Ltd does not condone the use of any harsh or inhumane treatment. Disciplinary policies and procedures must be clearly defined and

communicated to all workers and shall not include any corporal punishment, physical coercion or verbal abuse.

- Spaans Babcock Ltd actively promotes equality in the workplace, irrespective of nationality or legal status. All Suppliers, Subcontractors or Services Providers to Spaans Babcock must ensure that workers are paid at least the minimum wage required by applicable laws and workers shall not be forced to work in excess of the number of hours permitted by national law. All overtime must be voluntary unless contractually agreed and recompensed.
- Any supplier, Subcontractor or Service Provider to Spaans Babcock Ltd should ensure workers have freedom of movement. Workers should not be physically confined to Factory premises. Mandatory residence in employer operated facilities shall not be made a condition of employment.