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HUMAN SLAVERY STATEMENT

Financial Year 1 April 2026 to 31 March 2027

Introduction

VWS Westgarth Ltd. is absolutely committed to preventing slavery and human trafficking in all of its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking in all forms.

This statement sets out VWS Westgarth Ltd.'s actions to ensure that all staff understand the potential modern slavery risks related to our business, and the steps we have taken to ensure there is no modern slavery directly within our own business whilst minimising all practicable risks within our supply chains.

This statement relates to actions and activities during the financial year 1 April 2026 to 31 March 2027 and should be read alongside our previous statement covering the year 2025/2026, during which we:

- Completed rollout of the Smartsheet supplier management platform
- Reviewed and updated our supplier questionnaire to include enhanced modern slavery requirements
- Conducted supplier audits across key high-risk regions
- Delivered modern slavery awareness communications to all staff via the company intranet

As part of our role in the upstream, offshore water treatment market, we recognise that we have a responsibility to take a robust approach to preventing slavery and human trafficking across all of our operations and supply chains, both in the United Kingdom and internationally.

Our Organisation and Supply Chains

About VWS Westgarth Ltd.

VWS Westgarth Ltd. is part of the Veolia group and provides bespoke seawater and produced water treatment equipment to offshore operators worldwide. The business also provides a comprehensive range of complementary after-sales support services to customers and their installations globally.

Our head office is located in Scotland, with regional support offices in:

- England
- Angola
- Brazil

Countries of Operation

VWS Westgarth Ltd. designs and builds equipment on a global basis through international supply chains. Our principal areas of operational activity include:

- Middle East
- LATAM
- APAC
- Asia
- West Africa (including Angola)
- South America
- United Kingdom (Scotland & England)

Our Supply Chains

Our supply chains are global in nature and include:

- Equipment manufacturers supplying specialist components for water treatment systems
- Engineering subcontractors supporting project execution activities
- Logistics and freight providers operating across multiple jurisdictions
- Labour and staffing agencies providing specialist and general workforce support
- Professional services providers including legal, financial and technical consultants

We recognise that our supply chains, particularly those operating in Asia, Brazil and Africa, present the most significant risk of exposure to modern slavery and human trafficking, and we have focused our due diligence efforts accordingly.

Modern Slavery Risks in Our Business

High-Risk Activities

Assessment Process

VWS Westgarth Ltd. assesses modern slavery risks through the following process:

1. Supply chain mapping – We formally map our supply chain to identify product and geographical risks. This mapping is documented and reviewed on a periodic basis
2. Supplier questionnaire– All new and existing suppliers are required to complete our supplier questionnaire, which includes specific anti-slavery and human trafficking requirements
3. Conformity statements – All suppliers are required to issue a conformity statement confirming they do not support or engage in any form of modern slavery
4. Supplier audits – Where risk levels warrant, we conduct on-site supplier audits to verify the accuracy of information provided through the questionnaire process
5. Ongoing monitoring – We use our Smartsheet platform to continuously monitor supplier compliance and flag any areas of concern

Our Policies

VWS Westgarth Ltd. operates the following policies that describe our approach to identifying modern slavery risks and preventing slavery and human trafficking in our operations:

Modern Slavery and Human Trafficking Policy

Our dedicated Modern Slavery Policy sets out our zero-tolerance approach to modern slavery in all its forms and the responsibilities of all staff in upholding this commitment.

Whistleblowing Policy (00000-KP-00032)

VWS Westgarth Ltd. encourages all workers, customers and business partners to report any concerns related to our direct activities or supply chains, including any circumstances that may give

rise to an enhanced risk of slavery or human trafficking.

Our whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation. Employees, customers or others who have concerns can contact our confidential helpline at any time. All reports are investigated promptly and thoroughly.

Ethics Guide (00000-KP-00033)

Veolia's Ethics Guide makes clear to all employees the actions and behaviours expected of them when representing the organisation, including in relation to human rights and ethical conduct in all markets in which we operate.

Anti-Corruption Code of Conduct (00000-KP-00034)

This Code describes the principles and actions aimed at complying with the Veolia Group's commitment to forbid, without reservation, any form of corruption or equivalent behaviours, and to comply with all relevant regulations and best practices.

Supplier and Procurement Code of Conduct

Through our supplier questionnaire process, we verify that all suppliers have established a code of conduct or equivalent policy documents consistent with our own ethical standards and modern slavery prevention requirements.

Where a supplier has not developed adequate policies, we either:

- Request that the supplier and their sub-suppliers comply with our own policy requirements; or
- Refrain from allocating business to that supplier until compliance is achieved

Recruitment and Agency Worker Policy

We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency. All recruitment agencies are required to share their Modern Slavery Policy and Procedures with VWS Westgarth Ltd. prior to engagement.

Due Diligence Processes

VWS Westgarth Ltd. undertakes thorough due diligence when considering new suppliers and conducts regular reviews of existing suppliers. Our due diligence processes include:

Supply Chain Mapping

We formally map our supply chain to assess particular product and geographical risks of modern slavery and human trafficking. This mapping is documented, maintained as a formal record, and reviewed periodically to reflect changes in our supply base and the broader risk environment.

Supplier Questionnaire

All new suppliers are required to complete our comprehensive supplier questionnaire prior to approval. The questionnaire covers:

- Modern slavery and human trafficking policies
- Labour practices and worker welfare
- Subcontractor management
- Compliance with applicable laws and regulations
- Evidence of training and awareness programmes

The questionnaire is reviewed by a cross-functional team comprising representatives from:

- Procurement
- Quality Assurance (QA)
- Finance
- Health, Safety and Environment (HSE)
- Human Resources (HR)

Supplier Audits

Where risk levels indicate, we conduct supplier audits or assessments, primarily through qualified VWS Westgarth Ltd. auditors. Third-party auditors may also be engaged where specialist expertise is required. Audits assess:

- Compliance with our code of conduct
- Adequacy of anti-slavery and human trafficking policies
- Actual labour practices and working conditions
- Accuracy of information provided through the questionnaire process

Smartsheet Supplier Management Platform

VWS Westgarth Ltd. utilises Smartsheet as a robust supplier management platform to ensure compliance with the Modern Slavery Act 2015 and maintain thorough oversight of our supply chain. Through Smartsheet, we:

- Systematically track, review and approve all supplier documentation including modern slavery statements, ethical trading policies and compliance certifications
- Maintain a centralised repository of supplier compliance records
- Set automated reminders for document renewals and periodic reviews
- Conduct thorough due diligence reviews with a clear audit trail
- Monitor supplier compliance on an ongoing basis

This digital system ensures transparency, accountability and provides a clear audit trail of all supplier assessments and approvals.

Contractual Controls

Our standard conditions of purchase, used for all subcontracted work activities and procured equipment and services, include specific anti-slavery and human trafficking requirements. Suppliers are contractually obligated to comply with these requirements and to flow them down through their own supply chains.

Remediation

In the event that modern slavery or human trafficking is identified or suspected within our operations or supply chain, VWS Westgarth Ltd. will:

1. Immediately investigate the concern through our internal investigation process
2. Suspend the relevant supplier or activity pending the outcome of the investigation
3. Report any confirmed instances to the relevant authorities, including the National Crime Agency and the Gangmasters and Labour Abuse Authority (GLAA) where appropriate
4. Support any identified victims in accessing appropriate assistance and support services
5. Terminate contracts with suppliers where serious breaches are confirmed and remediation is not possible
6. Review our processes and controls to prevent recurrence

Training and Awareness

Staff Training

VWS Westgarth Ltd. requires all staff to complete training on modern slavery as a module within our wider human rights, ethics and ethical trade training programme. This training covers:

- Understanding and working towards compliance with the Modern Slavery Act 2015
- Understanding what modern slavery is and the various forms it takes, including forced labour, debt bondage, human trafficking, child labour and domestic servitude
- Recognising the signs of modern slavery in the workplace and supply chain
- Understanding the specific risks associated with our operating regions, including the Middle East, Asia, Brazil and West Africa
- Knowing how to report concerns, both within the UK and internationally
- Understanding what our organisation does to prevent modern slavery and the role each employee plays

All staff involved in supply chain management and HR are required to have completed this training by 31 October 2026.

Awareness-Raising Programme

In addition to formal training, VWS Westgarth Ltd. raises awareness of modern slavery issues through:

- Publishing this statement on our company website and internal intranet, with all related documentation accessible to staff
- Regular internal communications highlighting modern slavery risks and our commitments
- Briefings for staff working in or travelling to high-risk regions
- Supplier engagement communications reinforcing our expectations and requirements
- Sharing updates on modern slavery developments and best practice with relevant teams

Key Performance Indicators

VWS Westgarth Ltd. measures the effectiveness of its modern slavery prevention programme through the following key performance indicators:

- Staff training completion (supply chain management and HR)
- Staff training completion (all other staff)
- Supplier questionnaires completed for new suppliers
- Existing supplier questionnaire reviews completed
- Supplier audits conducted in high-risk regions
- Modern slavery concerns reported and investigated
- Supplier conformity statements received and recorded on Smartsheet

These KPIs will be reviewed and reported to the Board annually as part of our commitment to continuous improvement.

Responsibility

Responsibility for VWS Westgarth Ltd.'s anti-slavery initiatives is allocated as follows:

- CEO
- Head of HR
- Procurement Director
- QA Manager
- HR Department
- Finance Director
- HSE Manager

Looking Ahead – Commitments for 2026/2027

During the financial year 2026/2027, VWS Westgarth Ltd. commits to:

- Completing formal supply chain mapping documentation for all high-risk supply chains
- Achieving staff training completion on modern slavery
- Conducting a minimum of six supplier audits in high-risk regions
- Reviewing and updating our supplier questionnaire to reflect emerging risks
- Exploring membership of relevant industry bodies and initiatives addressing modern slavery
- Reviewing the effectiveness of our Smartsheet platform and expanding its use where appropriate
- Publishing our next annual modern slavery statement by 30 May 2027

Approval and Sign-Off

This statement was approved on 5 May 2026 by VWS Westgarth Ltd Managing Director, Company Secretary and Head of HR, who review and update it annually.

Managing Director

Mr Derek McIvor

Company Secretary's Signature:

Mr Kenneth Hall



Head of HR's Signature:

Mrs Victoria Kinchington



Date:- 05/05/26