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|  | Modern Slavery Statement | Doc. No.: G AA 112 07 Rev. 07 |
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1 Organisation

This statement is made by Hitachi Zosen Inova (“HZI”) in accordance with Section 54(1) of the UK Modern Slavery Act 2015 and relates to activities during the financial year 1 April 2022 to 31 March 2023.

This statement sets out the steps HZI takes to ensure that there is no slavery or human trafficking in its own business and its supply chains.

Only Hitachi Zosen Inova AG (a Swiss company), as the parent of several companies incorporated in the UK, meets the threshold required under the UK Modern Slavery Act. However, its subsidiaries follow the same principles and procedures described in this statement.

HZI is a global greentech company operating in Waste to Energy (WtE) and Renewable Gas. Our roots are in Switzerland, where we were established in 1933 as “L. von Roll Aktiengesellschaft”, later known as Von Roll Inova. Since 2010 we have been part of the Hitachi Zosen Corporation, one of Japan’s largest industrial and engineering firms and a longstanding partner and licensee of Von Roll Inova. To this day we foster the spirit of a traditional Swiss company combined with the know-how and economic strength of an international group.

We have been building and maintaining plants for almost 90 years. We develop projects with our clients and then draw on our experience as a general engineering, procurement and construction contractor to deliver on their behalf complex turnkey plants and system solutions for thermal and biological WtE recovery, gas upgrading and power to gas. We also offer comprehensive, expert

and reliable after-sales services for operators of existing plants. Quality is our greatest asset. Our unconditional endeavours to achieve this quality, together with our long experience and honest commitment, are what we pass on to clients.

The challenge of finding the best possible solutions for our clients, again and again, is what drives us. We work with them closely to find and develop integrated solutions to their individual needs and requirements – solutions based on a blend of proven technologies and passionate innovation that meet the highest quality, efficiency and environmental protection standards. This is why we're among the market leaders in our field: We love what we do.

1.1 Organisational structure

Hitachi Zosen Inova AG is wholly-owned by Hitachi Zosen Corporation, a Japanese corporation.

As of 31 March 2023 HZI is active in in the following markets, both itself and through wholly-owned and partly-owned direct and indirect subsidiaries:

United Kingdom

Various countries in the EU

Australia

Canada

Russia

Turkey

UAE

USA

1.2 Countries of operation and supply

HZI, together with its subsidiaries, is active in Europe and other regions across the world. The labour supplied to HZI in pursuance of its operation is carried out at project locations across the world primarily in Europe and the Middle East and also in Australia and North America.

2 Modern slavery

HZI considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

3 Commitment

HZI acknowledges its responsibilities in relation to combating modern slavery and commits to complying with the international and domestic legislation in this regard including the provisions in the UK Modern Slavery Act 2015. HZI understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

HZI does not knowingly enter into business with any organization, in the United Kingdom or elsewhere, which supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to HZI in the pursuance of the provision of its own services is knowingly obtained by means of slavery or human trafficking. HZI adheres to the standards required in relation to its responsibilities under relevant employment legislation in the countries of operation.

4 Supply chains

The main supply chains of HZI include those related to engineering & design, manufacturing, erection, operation and maintenance, laboratory services, spare parts management, retrofit and service from various suppliers in the United Kingdom and other countries where HZI and its subsidiaries operate. HZI's first-tier suppliers may have further contractual relationships with lower-tier suppliers.

HZI recognizes that it has a responsibility to take a robust approach against modern slavery and human trafficking.

HZI considers its main exposure to the risk of slavery and human trafficking to exist in the labour supply of construction and manufacturing both within first tier and lower tier suppliers.

In general, HZI considers its exposure to modern slavery and human trafficking to be limited as HZI assesses suppliers with significant contract values via transparent competitive tender processes and thereafter monitors such suppliers. Further details appear in section 5 below.

5 Steps

HZI has not, to the best of its knowledge, conducted any business with another organisation that has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, HZI has taken the following steps to ensure that its business and supply chains are free from modern slavery:

- Require all suppliers to commit to the HZI Supplier Code of Conduct. Suppliers are specifically required to respect best practice and the provisions of the UN Universal Declaration of Human Rights & the Conventions of the International Labour Organization regarding elimination of child labour and non-use of forced labour and eradication of slavery and human trafficking

- Monitor suppliers through an alert system that reports possible cases of compliance issues including modern slavery
- Reviewed its supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- Put qualification measures in place to identify and assess the potential risks in its supply chains
- Set up alert procedures: the employees of HZI are expected to report violations of the Code of Conduct or the Supplier Code of Conduct (both of which include prohibitions against modern slavery) to their managers or to the Compliance Officer, as appropriate. Employees may also use HZI's independent Alert Hotline – if desired, anonymously to notify any concerns, about either themselves or others
- Raised awareness by the publication of posters at construction sites, awareness within People & Culture teams and Site Manager training. These include hotline numbers and reporting mechanisms.
- Reviewed People & Culture policies and provided equal opportunities statements to branch offices and placed statements on our People & Culture information and advertisements
- In countries where national legislation on welfare and labour is weak, we strive to meet International Finance Committee (IFC) Performance Standard 2: Labour and Working Conditions Guidelines

6 Review

In order to measure its effectiveness in ensuring modern slavery is not taking place in the organisation or its supply chain, HZI is currently reviewing the World Bank's IFC Performance Standards on Environmental and Social Sustainability and in relation to Performance Indicator 2 Labour and Working Conditions for selected projects that require or would benefit from such review.

HZI has reviewed proposed changes to section 54 (September 2020) requiring organisations to publish their statements on a UK government website: [Modern slavery statement registry - GOV.UK \(modern-slavery-statement-registry.service.gov.uk\)](https://www.gov.uk/modern-slavery-statement-registry)

Further HZI will:

1. Continue to further raise awareness amongst staff, through work with established organisations and training providers;
2. Continue to identify, assess and monitor potential risk areas when developing sourcing strategies for major projects, to mitigate the risk of slavery and human trafficking occurring;
3. Periodically review the Modern Slavery Statement and other group policies and other applicable documents to ensure they remain up to date.

7 Policies and further applicable documents

HZI has the following policies which further define its stance on modern slavery.

- HZI Code of Conduct
- Supplier Code of Conduct
- Recruitment Procedures

8 Compliance

HZI Legal and Compliance together with all the managers and employees of all disciplines of HZI are engaged in combating modern slavery.

This statement is made in pursuance of Section 54(1) of the UK Modern Slavery Act 2010 and is reviewed and updated for each financial year.

9 Revision history

| Revision Index | Short Description of the Changes |
|----------------|--|
| 1 | Original statement |
| 2 | Updated for Financial Year 1 April 2017 to 31 March 2018 |
| 3 | Updated for Financial Year 1 April 2018 to 31 March 2019 |
| 4 | Updated for Financial Year 1 April 2019 to 31 March 2020 |
| 5 | Updated for Financial Year 1 April 2020 to 31 March 2021 |
| 6 | Updated for Financial Year 1 April 2021 to 31 March 2022 |
| 7 | Updated for Financial Year 1 April 2022 to 31 March 2023 |