

	<b>Modern Slavery Statement</b>	<b>Doc. No.: G AA 112 07 Rev. 06</b>
Author: <i>Georgette Banham</i>	Reviewer: <i>Thierry Dulong</i>	Approver: <i>Bruce Gailey</i>

**Table of contents**

**1 Organisation ..... 2**

1.1 Organisational structure..... 2

1.2 Countries of operation and supply ..... 3

**2 Modern slavery..... 3**

**3 Commitment ..... 3**

**4 Supply chains..... 3**

**5 Steps ..... 4**

**6 Review..... 5**

**7 Policies and further applicable documents ..... 5**

**8 Compliance..... 5**

**9 Revision history ..... 5**

## 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 2021 to 31 March 2022.

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

Only Hitachi Zosen Inova AG meets the threshold required under the UK Modern Slavery Act. However, its subsidiaries follow the same principles and procedures described in this statement.

### 1.1 Organisational structure

Hitachi Zosen Inova AG is owned by Hitachi Zosen Corporation, a Japanese corporation. Hitachi Zosen Inova AG (Switzerland) has the following direct subsidiaries:

- Hitachi Zosen KRB AG (Switzerland);
- Hitachi Zosen Inova UK Ltd (United Kingdom);
- HZI Service UK & Ireland Ltd (United Kingdom)
- Hitachi Zosen Inova Westfield Plant Operations Ltd (United Kingdom)
- Hitachi Zosen Inova Australia Pty Ltd (Australia);
- Hitachi Zosen Inova Deutschland GmbH (Germany);
- Hitachi Zosen Inova U.S.A. Holding Inc. (USA);
- Hitachi Zosen Inova France S.a.r.l. (France);
- Hitachi Zosen Inova Italia S.r.l. (Italy);
- Hitachi Zosen Inova Slovakia sro (Slovakia);
- HZI Jönköping Biogas AG; (Sweden);
- Hitachi Zosen Inova Canada Ltd (Canada);
- Hitachi Zosen Inova Rus LLC (Russia) ;
- Européenne de Services Techniques pour l’Incinération (E.S.T.I.) S.a.S. (France) ;
- Hitachi Zosen Inova Steinmuller GmbH (Germany);
- Blankenhain Verflüssigungs GmbH (Germany);
- Waste Treatment FZCO (Dubai, UAE)

Hitachi Zosen Inova Deutschland GmbH has the following subsidiaries:

- Hitachi Zosen Inova Schmack GmbH; (Germany);
- Hitachi Zosen Inova BioMethan GmbH; (Germany);
- Hitachi Zosen Inova Etogas GmbH; (Germany);

Hitachi Zosen Inova Steinmuller GmbH has the following subsidiary:

- Hitachi Zosen Inova Polska Sp.zoo (Poland);

Hitachi Zosen Inova U.S.A. Holding Inc. has the following subsidiaries:

- Hitachi Zosen Inova U.S.A. LLC.;
- HZIU Kompogas SLO INC.

	<b>Modern Slavery Statement</b>	<b>Doc. No.: G AA 112 07</b> <b>Rev. 05</b>
---	---------------------------------	--

HZIU Kompogas SLO INC. has the following subsidiaries:  
 Kompogas SLO LLC

## 1.2 Countries of operation and supply

HZI or its subsidiaries are 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.

## 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 the other countries where HZI operates. HZI 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 AG considers its exposure to modern slavery and human trafficking to be limited as HZI assesses all suppliers via transparent competitive tender processes and monitors suppliers on an ongoing basis. Further details appear in section 5 below.

## 5 Steps

HZI has not, to the best of its knowledge, conducted any business with another organisation which 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 modern slavery is not taking place:

- 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 all 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 to their managers or to the Compliance Officer, as appropriate. Employees may also use HZI's independent Alert Hotline – if desired, anonymously – in accordance with the laws and rules applicable in the country where they live or work
- Decided to raise awareness by the publication of posters at construction sites, awareness within HR teams and Site Manager training. These include hotline numbers and reporting mechanisms
- Reviewed HR policies and provided equal opportunities statements to branch offices and placed statements on our HR information and advertisements
- Meet International Finance Committee (IFC) guidelines on welfare and labour under Performance Standard 2.

## 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.

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 traffic occurring;

## 7 Periodically review the Modern Slavery Statement to ensure it remains up to date. 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 functions 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 will be reviewed for each financial year.

## 9 Revision history

Changes carried out with the revision: <b>Revision Index</b>	<b>Short Description of the Changes</b>
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