



**ALMAR WATER SOLUTIONS, S.L. ("ALMAR" or the "Company")**  
**ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

**Revision 1 - Adopted March 30, 2022**

**1. Scope**

This Policy develops the guidelines included in section eleven of the ALMAR Code of Conduct and constitutes ALMAR's reference framework on anti-slavery and human trafficking matters. The Policy explains the procedures through which ALMAR can maintain its high ethical standards and protect its reputation against any allegations of anti-slavery and human trafficking. Its successful implementation requires pro-active adoption at every level.

This Policy applies to all of the company's officers and directors, employees, agents, consultants, and representatives whether belonging to ALMAR or any of its affiliates (all together referred as "**Personnel**" or the "**Company**") as well as ALMAR's agents, contractors and their supply chains, consultants, joint venture partners, sponsors, suppliers, and representatives ("**Third Parties**"). Where certain provisions are intended to apply only to the company's officers, directors, and employees, references to the term "**Employee**" is instead used.

The Policy will be communicated to all Employees of ALMAR and every Employee of ALMAR is required to read and understand all aspects of this Policy and abide by it. ALMAR Management will assist each business unit with continuous refreshing and reinforcing of this Policy via application guidance and monitoring.

The relevant sections of this Policy and the Code of Conduct will be communicated to Third Parties according to the Third Parties Relationship Protocol by disseminating copies of Anti-Slavery and Human Trafficking Policy and Third Parties Ethics Code and requiring compliance with these at a minimum (and in some instances also, the compliance policies of ALMAR's end-users).

**2. Policy**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

ALMAR has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We take actions to ensure compliance with relevant guidance, including but not limited to the United National Universal Declaration of Human Rights 1948, the United Nations Convention on the Rights of the Child 1989 and the International Covenant on Civil and Political Rights 1976, the Council of Europe Convention for the Protection of Human Rights and Fundamental Freedoms, the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime and the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.



We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with the disclosure obligations set out under the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018. We expect the same high standards from all of our Third Parties, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

ALMAR's Code of Conduct is our statement of essential ethical and compliance principles that guide our daily operations. The Code of Conduct makes it clear that ALMAR expects its officers, directors, employees, agents, consultants, contractors and their supply chains, and representatives to act in accordance with all laws and applicable Company policies, including any local anti-slavery and human trafficking laws. This ALMAR Anti-Slavery and Human Trafficking Policy (the "**Policy**") supplements the Code of Conduct by providing detailed guidance for complying with anti-slavery and human trafficking laws that are applicable to ALMAR activities.

Modern slavery and human trafficking can also be relevant factors in the US, EU and UK's sanctions framework, and therefore this Policy should also be read alongside ALMAR's Sanctions Policy, which sets out the framework in respect of US, EU and UK sanctions.

### **3. Responsibility for the Policy**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Compliance Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Chief Compliance Officer.

### **4. Compliance with the Policy**

You must ensure that you read, understand and comply with this policy. You may not attempt to circumvent this Policy, including by authorizing, implicitly or explicitly, any intermediary or any other Third Party to engage in any of the behaviors prohibited by this Policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.



You must notify your manager or the Chief Compliance Officer or the confidential Communications Channel as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or Chief Compliance Officer or report it in accordance with our reporting procedures (set out at section 21 of the Code of Conduct and section 15 of the Third Parties Ethics Code) as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains. Employees may also report such concerns directly to any senior executive, or any member of the Company's Board of Directors.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Chief Compliance Officer or the confidential Communications Channel.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Compliance Officer immediately. If the matter is not remedied, and you are an employee, you should raise it in accordance with our reporting procedures (set out at section 21 of the Code of Conduct and section 15 of the Third Parties Ethics Code).

## **5. Communication and Awareness of this Policy**

The Chief Compliance Officer will conduct or arrange for training sessions on this Policy to be provided to appropriate Personnel at all major Company office and work locations periodically, and as part of the induction process. Appropriate attendees shall be identified by the Chief Compliance Officer using a risk analysis, and attendance by those identified to such training sessions shall be mandatory.

Failure of these designated Personnel to attend training sessions may result in disciplinary action according to the applicable labor laws and regulations –i.e. any Laws, legislation, rules, national collective bargaining agreements, company level agreements, etc. that apply to ALMAR in each country where it provides services, as a consequence of the breach by these designated Employees of the Company's orders and instructions. Those who work in areas within our business identified as being particularly high risk will receive additional training and support in identifying and preventing modern slavery and human trafficking activities.

Personnel shall have the opportunity to ask question and have one-on-one discussions with the trainers or Chief Compliance Officer if requested.



Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all Third Parties at the outset of our business relationship with them and reinforced as appropriate thereafter.

**6. Breaches of this Policy**

Any breach of this Policy can have devastating consequences for ALMAR and will be regarded as a very serious matter by the Company and is likely to result in disciplinary measures, up to and including termination for cause.

Persons or entities who provide services to the Company as Third Parties (including but not limited to agents, contractors and their supply chains, consultants, joint venture partners, sponsors, suppliers, or representatives) should similarly expect to have their contracts terminated for cause if they violate this Policy, and ALMAR reserves the right to seek compensation for damages resulting from breaches of this Policy.

**7. Periodic Certification**

As set out in the Code of Conduct, the Company will seek to obtain, on an appropriate schedule as determined by the CCO, a certification of compliance with this Anti-Slavery and Human Trafficking Policy, from all Personnel. The certificate that must be signed by directors, officers and employees of the Company is included as Appendix 1 of this Policy. The certificate that must be signed by Third Parties is included as Appendix 2 of this Policy.

**8. Revision to this Policy**

Compliance with this Policy will be constantly and continuously monitored by the CCO. The CCO will provide advice and guidance to staff on the guidelines and principles included in this Policy.

The Board of Directors is responsible for approving the modifications that are intended to be made to it in order to update, improve or adapt its forecasts to legal requirements, to the highest standards and good ethical practices or to new needs that may be detected.



**Appendix 1**

**ALMAR WATER SOLUTIONS, S.L. ("ALMAR" or the "Company")**

**ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

**Revision 1 - Adopted XX, 2022**

**RECEIPT AND ACKNOWLEDGEMENT –**

I, \_\_\_\_\_, declare that I have received, read and understand ALMAR's Anti-Slavery and Human Trafficking Policy Revision 1 – Adopted March 30, 2022, and that I agree to comply with all of its provisions.

By:

\_\_\_\_\_

Date: [\_\_\_\_]



## Appendix 2 – Compliance Certificate

To: Almar Water Solutions, S.L. (“ALMAR”)  
Maria de Molina 39, 6th floor  
28006, Madrid, Spain

Dear sirs,

I [ ] as a duly authorized representative of [ ] (“**the Company**”) certify that all the information provided to ALMAR in connection with this inquiry corresponds and reflects the current situation of the Company and that, to the best of our knowledge, there are not any events that may affect any of the statements provided to ALMAR in the input Excel file provided (“ALMAR Suppliers Questionnaire”).

With respect to the Compliance section in the input Excel file I hereby certify, for and on behalf of the Company, the following:

(a) **The Company** has received and understood that it must comply with ALMAR’s Anti-corruption policy, Anti-Slavery and Human Trafficking policy, Third Parties Ethics Code and, where provided, ALMAR’s clients’ codes of conduct. Any defined terms in this certificate have the meanings assigned to them in ALMAR’s Third Parties Ethics Code.

(b) **The Company** undertakes to require that its subcontractors and suppliers in relation to ALMAR contracts abide by the terms of ALMAR’s Anti-corruption policy, Anti-Slavery and Human Trafficking policy, Third Parties Ethics Code and, where provided, ALMAR’s clients’ codes of conduct.

(c) **The Company** undertakes to conduct US, UK, EU, Australia, and UN sanctions screening on its subcontractors and suppliers (and will provide information sufficient to allow ALMAR to conduct its own sanctions screening process on such entities).

(d) **The Company** and all its affiliates, subsidiaries, subcontractors, and suppliers are in compliance with (as in effect on the date of this Certificate) all applicable Anti-Corruption Laws (including any anti-corruption or anti-bribery laws, regulations or requirements of any jurisdiction enacted, promulgated or passed after the date of the Agreement that are applicable to ALMAR) and Labour Laws in particular, those related to working conditions, anti-slavery, human trafficking, social security contributions, tax obligations, health & safety, environmental protection and data privacy.

(e) Neither the **Company** nor any of its affiliates or subsidiaries (i) has made, offered, authorized or promised to make any prohibited payment, directly or indirectly, in contravention of any Anti-Corruption Laws; (ii) has subjected to abuse any person it employs or any persons with whom its personnel work, or is aware of any slavery or human trafficking taking place in its supply chains, facilities or any part of its operations; (iii) is a sanctioned party under any US, UK, EU, Australian, or UN sanctions or has made any payment in contravention of such sanctions; or (iv) has taken any action or engaged in any activity that could reasonably be expected to expose ALMAR (or any of its affiliates) to any risk of criminal or civil penalties under any applicable Anti-Corruption, sanctions or Labour Law.



(f) Each of the representations set forth in the compliance section of the input Excel file is true and correct in all respects as of the date of this Certificate.

(g) **The Company** further agrees that if subsequent developments cause this certificate to be no longer accurate, **the Company** will immediately advise ALMAR of such change in circumstances.

Dated  
By:  
Printed Name:  
Title: