

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

ALMAR WATER SOLUTIONS, S.L.U and
SUBSIDIARIES

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1. INTRODUCTION

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as Slavery, servitude, forced and compulsory labor, coercion, threats or deception to exploit victims and Human Trafficking, all of which have in common the deprivation of a person's freedom by another for the purpose of exploiting that person for personal or commercial gain.

This Policy elaborates on the guidelines contained in ALMAR's Code of Conduct and constitutes ALMAR's framework for combating Slavery and Human Trafficking.

The Policy is communicated to all ALMAR Employees and all ALMAR Employees must read and understand all aspects of this Policy and comply with it, which Employees confirm through their Code of Conduct attestation.

2. DEFINITIONS

- **Slavery, servitude, and forced or compulsory labor:** any work or action performed involuntarily and under threat.
- **Human Trafficking:** organizing, recruiting (including deceptive recruiting), exchanging, harboring, receiving, or facilitating the travel or transportation of another person for the purpose of carrying out any form of exploitation of that person.
- **Exploitation:** subjecting, by force coercion, threats, deception or abuse of vulnerability, a person to perform any activity or action for another person's benefit. This includes, but is not limited to, sexual exploitation, forced or compulsory labour, labour exploitation, debt bondage, slavery, servitude, domestic servitude, child labour, forced marriage, criminal exploitation, and the removal of organs or tissues.
- **Deceptive recruiting:** engaging in conduct with the intention of inducing, recruiting or causing a person to enter into an engagement to provide labour or services, where such conduct causes the person to be deceived about material aspects of the engagement, including the person's freedom to leave the workplace, work area or residence, freedom to stop providing the labour or services, the existence or amount of any debt, whether the engagement will involve exploitation, the confiscation of travel or identity documents or, where applicable, the provision or nature of sexual services.

3. PURPOSE

The purpose of this Policy is to establish a framework for action to ensure **ALMAR's zero tolerance of Human Trafficking and modern Slavery**. In this regard, ALMAR is convinced that Human Trafficking and modern Slavery must be combated as serious human rights issues.

4. SCOPE

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

This Policy applies regardless of the country in which business activities are carried out. In the event of any inconsistency between local law and this Policy, you must comply with the requirement that imposes the higher standard of conduct.

5. GOVERNANCE

ALMAR's Compliance Committee has the primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, addressing with any queries about it, and auditing internal control systems and procedures to ensure that they are effective in the fight against modern Slavery.

In this regard, the Compliance Committee will organize training sessions, face-to-face or online, on this Policy, attendance of which is mandatory.

Management at all levels is responsible for ensuring that employees understand and comply with this policy.

6. GENERAL PRINCIPLES

The actions carried out by the Personnel and Third Parties must always be respectful of the following principles:

- **Zero tolerance for modern Slavery:** All Personnel must be committed to combating any actions that may promulgate, favor, cover up or encourage any work or action that is carried out involuntarily and under threat.

- **Integrity, ethics and professionalism:** The business and professional activity of ALMAR and the Staff must be based on the principles of integrity, honesty, ethics and professionalism.
- **Due Diligence:** ALMAR shall take all necessary and effective measures to identify, prevent, mitigate, account for, and respond to negative impacts of its own activities and those of Third Parties with whom it interacts, insofar as they affect human rights.
- **Transparency in the supply chain:** ALMAR is committed to complying with the law, respecting the rules of the market, and not succumbing to corrupt practices that may encourage activities related to modern Slavery, Human Trafficking, exploitation or forced labor.

7. GUIDELINES OF CONDUCT

The following are the **guidelines of conduct** that all Personnel must observe in the conduct of their professional activity:

1. **Systems and controls for the prevention of modern Slavery:** 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 that modern Slavery does not take place anywhere in our own business or in any of our supply chains. We take steps to ensure compliance with relevant guidelines, including, but not limited to, the 1948 United Nations Universal Declaration of Human Rights, the 1989 United Nations Convention on the Rights of the Child and the 1976 International Covenant on Civil and Political Rights, 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, ILO Convention No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor.
2. **Own and Third-Party commitment against modern Slavery:** We are also committed to ensuring that there is transparency in our own business and in our approach to addressing modern Slavery across our supply chains, in line with the disclosure obligations set out in the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 and Criminal Code Act 1995, the U.S. Uyghur Forced Labor Prevention Act 2022, UN Guiding Principles on Business and Human Rights and OECD Due Diligence Guidance.

We expect the same high standards from all our Third Parties. Through our third-party management framework, including due diligence processes, contractual requirements and the Third-Party Code of Ethics, we prohibit the use of forced labour, compulsory labour, human trafficking and any form of modern slavery or servitude, whether involving adults or children. We also expect our suppliers and business partners to apply equivalent standards throughout their own supply chains and subcontracting arrangements.

ALMAR prohibits the employment of children below the minimum legal working age and expects all suppliers and business partners to maintain effective controls to prevent child labour throughout their operations and supply chains.

3. **Commitment to legality and prevention of international financial sanctions:** Modern Slavery and Human Trafficking can also be relevant factors in the U.S., EU, and U.K. sanctions framework, so this Policy should also be read in conjunction with ALMAR's Sanctions Policy, which sets out the framework with respect to U.S., the EU and the UK sanctions.
4. **Remediation:** Where actual or potential cases of Modern Slavery or Human Trafficking are identified, ALMAR will take appropriate corrective actions, including protecting affected individuals, cooperating with competent authorities, requiring remediation plans from suppliers, monitoring corrective actions, and terminating business relationships where adequate remediation is not achieved.

The implementation of these commitments is supported through a framework of policies, procedures, risk assessment, due diligence and contractual controls applicable to third-party relationships and supply chain activities.

8. COMPLIANCE & REPORTING

The prevention, detection and reporting of modern Slavery in any part of our business or supply chains is the responsibility of all those who work for ALMAR or are under its control.

Personnel and Third Parties have a duty to report any knowledge or reasonable suspicion about possible breaches of this Policy in any part of our business or supply chains at any supplier level, in addition to direct communication with their line manager, the Compliance Committee or any member of senior management, who will have a confidential and anonymous **Communication Channel**, accessible through the Intranet and the Corporate Website, or directly by entering the following address in the Internet search engine:

<https://almarwater.i2-ethics.com/#/>

All reports received will be assessed promptly and, where appropriate, investigated in accordance with the Company's internal procedures. Where allegations are substantiated, corrective and remediation measures will be implemented in accordance with Section 7 of this Policy.

ALMAR will not tolerate any form of retaliation, discrimination, or penalty against those who report in good faith. For the purposes of Australian law, "good faith" is not required to obtain protection; it is sufficient that the person has reasonable grounds to suspect that the reported information concerns misconduct or an improper state of affairs or circumstances. Notwithstanding the foregoing, the Company reserves the right to take disciplinary action in accordance with the provisions of the disciplinary regime if the complaint submitted is found to be false and in

bad faith.

Similarly, Personnel and Third Parties may raise any questions or doubts they have about the interpretation of the Code (Code of Conduct or Third-Party Code of Ethics) through the aforementioned means.

Please note that, where appropriate, and with the welfare and safety of local workers as a priority, we can provide support and guidance to our suppliers to help them address coercive or exploitative labor practices in their own business and supply chains.

Breaches of this Policy by Personnel may result in the imposition of **disciplinary action** by ALMAR, including suspension, termination and, in some cases, civil and/or criminal liability, in accordance with the applicable disciplinary regime and employment law. In addition, Third Parties should similarly expect their contracts to be terminated for cause if they violate this Policy, and ALMAR reserves the right to seek compensation for damages resulting from breaches of this Policy.

9. REVIEW AND APPROVAL

This Policy shall enter into force after its approval by the Board of Directors and must be communicated to all Personnel and Third Parties.

This Policy shall be reviewed at least annually from a risk and regulatory monitoring perspective and formally updated whenever required due to relevant legislative, organizational, business, risk or control changes.

The Board of Directors is responsible for approving modifications to the Policy to improve or adapt it to legal requirements, to the highest standards and good ethical practices or to new needs that may be detected.