

Aqseptence Group GmbH

Modern Slavery Statement

1. PURPOSE OF THIS POLICY AND IDENTIFICATION OF REPORTING ENTITY

- 1.1 This statement is made by Aqseptence Group GmbH (German registration number HB16669), being a reporting entity pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) ("**the Act**") and covers the relevant report period ending 31 December 2021.
- 1.2 Aqseptence Group GmbH is committed to upholding strong corporate values and behaviours and to respecting human rights (including anti-slavery provisions) in its interactions with its employees, customers, communities and suppliers.
- 1.3 Aqseptence Group GmbH has a zero-tolerance approach to modern slavery. Aqseptence Group GmbH's commitment to maintain the highest ethical standards is reflected by its regulations, in particular by applying the Aqseptence Group's Code of Conduct as a guideline for our employees dealing with ethical challenges in the course of everyday business.
- 1.4 Aqseptence Group GmbH has reviewed its existing compliance and risk management processes and previous statement made under the Act to review the measures already in existence, and what further measures may be required to prevent slavery taking place in any part of its businesses.

2. MODERN SLAVERY

- 2.1 Modern slavery is a grave problem affecting many people around the world.
- 2.2 Modern slavery is a criminal offence and can occur in various forms, 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. Slavery under the Act includes, *inter alia*, the following criminal activities:
 - a. Slavery: where ownership is exercised over an individual;
 - b. Servitude: involves the obligation to provide service imposed by coercion;
 - c. Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty;
 - d. Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them.
 - e. The worst form of child labour: the employment of children that is exploitative or is likely to be hazardous to or interfere with a child's education, health (including mental health), physical wellbeing or social development.
- 2.3 This statement has the aim of the prevention of opportunities for modern slavery to occur within its businesses.

3. STRUCTURE, OPERATIONS AND SUPPLY CHAINS OF AQSEPTENCE GROUP GMBH

- 3.1 Structure and operations:
 - a. Aqseptence Group GmbH is part of a group of companies the structure of which is annexed and marked "A" ("**the Group**") employing around 2,000 employees in the group, 402 of those being employed directly by Aqseptence Group GmbH.
 - b. Aqseptence Group owns the following entities:

- i. Aqseptence Newco GmbH (DE);
 - ii. Aqseptence Newco 2 GmbH (DE);
 - iii. Aqseptence Group Srl. (Italy);
 - iv. Aqseptence group OOO (Russia);
 - v. Aqseptence Group Carpi s.r.l. (Italy);
 - vi. B-Plas SBRL (Italy)
 - vii. Aqseptence Group SAS (France);
 - viii. Aqseptence Group Co. Ltd. (China);
 - ix. Aqseptence (China) Co., Ltd.;
 - x. Aqseptence Group SAS, Soissons (France);
 - xi. Tubafor Maroc S.A.R.L. (Marroco);
 - xii. Faust Pumpwerkbau GmbH (DE);
 - xiii. Aqseptence Group FZCO (UAE);
 - xiv. Aqseptence Group Japan Ltd. (Japan);
 - xv. Aqseptence Group Inc. (USA);
 - xvi. Aqseptence Group Pty Ltd (Australia);
 - xvii. Nahuelco Argentina S.A. (Argentina)
 - xviii. Aqseptence Group S.A. (Chile);
 - xix. Aqseptence Group (India) Private Ltd. (India);
 - xx. Aqseptence Group Filtration Ltda. (Brazil).
- c. Aqseptence Group GmbH is part of the abovementioned Group of companies that is a leading global supplier of specialised products, equipment and system solutions for filtration, separation and water technology, serving industrial and municipal customers in Europe, North and South America, Asia and Australia.
- d. Aqseptence Group GmbH is the headquarters of four of the Group's seven key brands, - Geiger, Noggerath, Passavant, and Roediger. With all four brands, the contribution within those brands include sales of the related products and services, as well as on-site manufacturing at those respective locations.
- i. The Geiger brand is a provider of water intake systems for power plants, desalination, irrigation, water plants and other industrial applications. Geiger products include Drum Screen Intake Solutions, MultiDisc Solutions, Open Water Intake Solutions, and Passive/Off-Shore Intakes.
 - ii. The Noggerath brand is in the field of water and waste water treatment, which provides a broad product and solution portfolio for municipal and industrial applications, such as headworks systems, fine and micro screening systems, pumps and services around our products including spare parts support.

- iii. The Passavant brand is in the field of water and waste water treatment, which provides a broad product and solution portfolio for municipal and industrial applications, such as headworks systems, sludge treatment, filtration and related services.
 - iv. The Roediger brand includes Vacuum Technology Systems, which are proven technologies for conveying wastewater and innovative solutions for modern supply and disposal systems.
 - e. Aqseptence Group GmbH's registered office is located at Corporate Headquarter, Passavant-Geiger-Strasse 1, 65326 Aarbergen, Germany. Aqseptence Group GmbH carries on business in Australia.
- 3.2 Supply chain
- a. Aqseptence Group GmbH's and the Group's supply chain consists of goods and services from suppliers and specialists from Australia and internationally including the items outlined in paragraph 3.1.d.
- 4. DESCRIBE THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF THE REPORTING ENTITY, AND ANY ENTITIES THAT THE REPORTING ENTITY OWNS OR CONTROLS**
- 4.1 Modern slavery risks and issues could arise as a result of any of Aqseptence Group GmbH's business operations and supply chains; therefore, the day-to-day responsibility for management of modern slavery resides within each individual business unit. This includes implementing processes and controls to ensure compliance with the requirements of this statement relevant to their operations.
- 4.2 Aqseptence Group GmbH conducts periodic risk assessment for operational activities and suppliers where it considers the likelihood and impact of known modern slavery risk factors. The risks assessed included:
- a. Sector and industry risks – certain sectors and industries may have higher modern slavery risks because of their characteristics, products and processes. An example of this is the use of foreign workers or unskilled labour to carry out functions at night-time or in remote locations.
 - b. Product and services risks – certain products and services may have higher modern slavery risks because of the way they are produced, provided or used. Examples include excessive work hours or child labour.
 - c. Geographic risks – Some countries may have higher risks of modern slavery due to poor governance, weak law, conflict, migration flows and poverty.
 - d. Entity risks – some entities may have modern slavery risks because of poor governance structures, a record of treating workers poorly or a record of human rights violations.
- 4.3 Aqseptence Group GmbH focuses on identifying relevant risks by collecting compliance information concerning each supplier before entering into contractual relationships as well as regularly reviewing existing business partners. Non-compliance issues are prevented through contract management, regular internal audits, review and meetings.
- 4.4 As at the date of this statement, it is considered that the risk of modern slavery in Aqseptence Group GmbH's business activities (and those entities it controls) is low.
- 4.5 In conducting this assessment, Aqseptence Group GmbH acknowledges that:
- a. Visibility of modern slavery practices in the downstream supply chain is limited.
 - b. Modern slavery risks to Aqseptence Group GmbH will change over time as operational requirements change and understanding of our supply chain improves.

5. DESCRIBE THE ACTIONS TAKEN BY THE REPORTING ENTITY AND ANY ENTITIES IT OWNS OR CONTROLS TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

- 5.1 The Compliance Team (“**Compliance Team**”) are primarily responsible for reviewing and overseeing on risks and prevention of modern slavery and for incorporating considerations into relevant policies, procedures, frameworks, action plans and associated training programs for Aqseptence Group GmbH and the entities it controls. As at the date of this statement, the Compliance Team consists individuals from the Group - Thomas Jacobi, Director Human Resources & Legal; Barbara Hensgen, Corporate Legal Counsel, and Dan Donoghue, Corporate Legal Counsel.
- 5.2 The Management Board also oversees and recognises the importance of compliance, including the matters considered in this statement and the Act.
- 5.3 Aqseptence Group GmbH and its controlled entities are committed to the continuous work to ensure that there is no modern slavery and labour related harm from its operations and supply chain. Aqseptence Group GmbH and its controlled entities are committed to the following principles:
- a. No child labour or forced labour is used, and that employment is freely chosen;
 - b. Workers have fair wages and employment agreements;
 - c. Work hours do not exceed the maximum limit set by relevant legislation;
 - d. All workers are free to exercise their right to form and/or join trade unions and to bargain collectively;
 - e. Workers experience fair and equal treatment and access to opportunity;
 - f. All workers’ health and safety is protected in the workplace.
- 5.4 Modern Slavery related risks will be considered as part of due diligence, risk assessment and monitoring processes where appropriate. Review processes will be undertaken to review the effectiveness of Aqseptence Group GmbH and its controlled entities’ modern slavery requirements. As outlined above, by collecting compliance information concerning each supplier before entering into contractual relationships as well a regularly reviewing existing business partners. Non-compliance issues are prevented through contract management, regular internal audits, review and meetings.
- 5.5 As part of due diligence and risk assessment processes, Aqseptence Group GmbH and its controlled entities may consider relevant best practice industry standards and guidelines, certifications and verification systems in assessing whether third parties are giving due consideration to human rights related risk.
- 5.6 Aqseptence Group GmbH and its controlled entities will take a risk-based approach to decide when increased due diligence is required to understand, assess and address the potential human rights violations associated with its business relationships, customers and transactions.
- 5.7 Where a risk of modern slavery is identified, Aqseptence Group GmbH will continue to provide education to staff on any potential risks/impacts and possible controls. These may include closer due diligence of suppliers. Aqseptence Group GmbH’s internal legal team will assist to determine any specific areas that should be more closely monitored and include additional clauses in contracts as appropriate.
- 5.8 Should Aqseptence Group GmbH discover that, through the actions of third parties, it is (or may be) associated with modern slavery violations, appropriate action will be taken in a timely manner. Actions may include notification to regulators and/or law enforcement agencies, engaging with the relevant parties to promote good practice and/or avoiding the business relationship.

- 5.9 Whilst Aqseptence Group GmbH and its controlled entities take steps to ensure that modern slavery is not taking place in its supply chains, Aqseptence Group GmbH acknowledges that it does not control the conduct of individuals and organisations in its supply chains. However, Aqseptence Group GmbH will continue to implement the following measures:
- a. conduct risk assessments when appropriate to determine which parts of the business and which of the suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
 - b. conduct pre-screening on business partners, suppliers and contractors and introduce contractual provisions for them to confirm their adherence to this statement and accept Aqseptence Group GmbH's right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion;
 - c. reserve the right to terminate any contractual arrangement if there is breach of this statement.
- 5.10 In addition, Aqseptence Group GmbH and its controlled entities will continue to conduct business in a way that respects the rights, dignity and equality of people, and avoids complicity in human rights abuses, while complying with legal and regulatory requirements which incorporate the protection of human rights. These include:
- a. employment laws, covering areas such as discrimination, harassment – including sexual harassment, workplace bullying, victimisation, domestic violence and occupational health and safety; and
 - b. consumer, customer, community and supply chain related requirements, covering areas such as responsible products and services, accessibility requirements and modern slavery.
- 5.11 Aqseptence Group GmbH will continue to:
- a. avoid causing or contributing to adverse human rights impacts through Aqseptence Group GmbH's own business activities, and address such impacts if they occur;
 - b. take actions to promote a culture of respect for human rights and embrace both inclusion and diversity in Aqseptence Group GmbH's workforce, with equal opportunities for all;
 - c. take actions to build an inclusive culture where differences are valued, including considering the rights of people with a disability and raising awareness of accessibility; and
 - d. ensure mechanisms to allow those adversely affected to raise concerns and seek remedy (as appropriate).
- 5.12 Employees of Aqseptence Group GmbH and its controlled entities are encouraged to raise any concerns about suspected modern slavery associated with Aqseptence Group GmbH and its controlled entities or our suppliers and should do this through directly contacting the Compliance Team
- 5.13 Aqseptence Group GmbH and its controlled entities aim to encourage openness and will support anyone who raises genuine concerns in good faith under this statement, even if they turn out to be mistaken. Aqseptence Group GmbH and its controlled entities 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.

6. DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

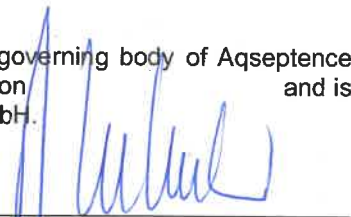
6.1 Aqseptence Group GmbH and its controlled entities assess the effectiveness of actions being taken to assess and address modern slavery risks through contract management, regular internal audits, review and meetings.

7. DESCRIBE THE PROCESS OF CONSULTATION WITH ANY ENTITIES THE REPORTING ENTITY OWNS OR CONTROLS

7.1 Aqseptence Group GmbH has meaningful and ongoing dialogue amongst all of the entities in the Group. This includes segment guidelines, as well as legal entity guidelines and business unit guidelines. In addition, any relevant topics regarding the Act are to be included in briefings for the boards of the Group as well as the key stakeholders and business unit leaders.

8. ANY OTHER RELEVANT INFORMATION

8.1 This statement was presented to and approved by the principal governing body of Aqseptence Group GmbH, being the Board of Directors of Aqseptence Group on _____ and is signed below by a responsible members of Aqseptence Group GmbH.



Name: Baldassare La Gaetana

Position: Managing Director and Chief Executive Officer of Aqseptence Group GmbH



Name: Florian Will

Position: Managing Director and Chief Financial Officer of Aqseptence Group GmbH



Name: Rosario E. Tagliavini

Position: Managing Director and Chief Operating Officer of Aqseptence Group GmbH