

# Cowater International's Prevention of Modern Slavery and Human Trafficking Policy

Last Reviewed: 1 May 2022

## 1 Purpose and Scope

Cowater International ("Cowater") is committed to the highest ethical and professional standards. As a company, we conduct business with honesty, integrity and in compliance with all applicable laws. We have developed and implemented the following key best practices to ensure we meet and exceed our obligations on combating Modern Slavery and Human Trafficking.

Our approach to combatting modern slavery and human trafficking recognizes the need for continuous improvement and we will be monitoring and reviewing the policy and adapting, as appropriate, to reflect evolving business and cultural requirements.

## 2 Definitions

*The below definitions on Human Trafficking and Modern Slavery have been adapted from the United Nations.*

Appropriate Authority:	The term "Appropriate Authority" represents Cowater's Chief Executive Officer or any member of the Executive team, Human Resources, Cowater's Vice Presidents or their delegates, or Project Directors and Managers in a position to make a judgment call on next steps and actions resulting from allegations of non-compliance to the Code of Ethics and Professional Conduct and Policies.
Contractor:	Anyone who has a contractual relationship with Cowater, including project staff, consultants, associates, etc.
Employee:	Any individual employed by Cowater and who specifically works out of a Corporate/Hub location.
Human Trafficking:	Human Trafficking is the recruitment, transportation, transfer, harboring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit.
Modern Slavery:	Modern slavery refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power. Modern slavery is an umbrella term covering practices such as forced labour, child labour, debt bondage, forced marriage, and human trafficking. Modern slavery is a crime and a violation of fundamental human rights.

## 3 Policy Statement

Cowater strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are and will continue to be committed to implementing systems and controls aimed

at ensuring that modern slavery and human trafficking is not taking place anywhere within our organization or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

Cowater's policy is to oppose modern slavery and human trafficking vigorously. As such:

- We do not and will not tolerate human trafficking or modern slavery in any aspect of our own work;
- We are committed to addressing suspected engagement of human trafficking and modern slavery activities across our supply chains;
- We will collaborate with other organizations to present a united front against human trafficking and modern slavery in our wider working environment; and
- We will ensure that our employees and contractors are aware of the risks of human trafficking and modern slavery and to provide support when such a risk is detected and reported, in alignment with applicable laws.

## 4 Responsibility of Cowater

Every Cowater employee and contractor has a direct responsibility to abide by Cowater's Prevention of Modern Slavery and Human Trafficking Policy, including:

- Setting an example of ethical behavior in compliance with this Policy; and
- Reporting situations to a member of the Appropriate Authority if there is any reason to suspect that human trafficking and modern slavery has taken, is taking or may take place, whether or not it involves you or Cowater directly.

Although Cowater has a strong position on modern slavery and human trafficking policy compliance, Cowater's responsibility to act against these challenges outside of our supply chain and wider working environment has limitations. Accordingly, this policy does not establish a responsibility on the part of Cowater staff (including employees and contractors) to do anything more than report any actual or suspected modern slavery and human trafficking concerns. It is the responsibility of Cowater's executive team to decide on any actions pertaining to modern slavery and human trafficking reporting, including any collaboration with other organizations as appropriate.

## 5 Safeguarding Measures

Cowater, its employees and contractors have the following roles to play in supporting and upholding the Safeguarding measures against modern slavery and human trafficking:

### 5.1 Role of Cowater

- Periodic review of our contracting processes ensures that there is careful consideration regarding the inclusion of specific prohibitions against modern slavery and human trafficking in our contracts with third parties;
- Cowater may request at any time that third parties acting as an intermediary between Cowater, its employees and/or contractors, sign an acknowledgement of our Code of Ethics and Professional Conduct and appended policies, including this Policy;
- Cowater will consider carrying out audits of suppliers for their compliance with this Policy, under warranted circumstances, as part of our risk assessment and due diligence process; and
- Cowater will investigate any reporting of modern slavery in any part of our organization or supply chain and seek to find a resolution in accordance with applicable laws.

## 5.2 Role of Employees and Contractors

- All employees and contractors will review and acknowledge new hire and/or annual training on our Code of Ethics and Professional Conduct, which includes this Policy;
- Adhere to a zero-tolerance approach to modern slavery and human trafficking in our organization and our supply chains;
- Refuse to engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy; and
- Report any suspected activity of modern slavery or human trafficking to the appropriate authority.

## 6 Transparency in Supply Chains

Cowater's projects require the mobilization of personnel, source equipment, resource allocation and operations in complex working environments, highlighting the potential risks of modern slavery and human trafficking in our supply chains. Our own work is protected by our internal standards as well as those of our clients, and we insist that our direct suppliers conform to those standards. We recognize that our challenge is to unveil and take action against modern slavery and human trafficking that may be taking place in our supply chains. To this effect, Cowater diligently maintains transparent practices when advancing on the preparation of a proposal and competitive bidding activities for any procurement.

## 7 Risk Management and Due Diligence

As specified in the Code of Ethics and Professional Conduct, Cowater conducts due diligence assessments when considering any partner or supplier considered to pose a risk in this domain. This includes but is not limited to an exhaustive real-time database of all global sanctions notices, as well as regulatory and law-enforcement agencies, and adverse media in the public domain. Cowater may require evidence of ethical labour practices or pursue a further investigation prior to engaging in any service contract or collaboration to ensure that risk is minimized.

As part of this due diligence process, Cowater ensures that suppliers have no reporting of:

- Exploitation of children;
- Human trafficking;
- Forced and slave labour; and/or
- Sexual exploitation.

## 8 Awareness, Training and Performance Indicators on Modern Slavery and Trafficking

Employees and contractors are required to adhere to Cowater's Code of Ethics and Professional Conduct, which prohibits any engagement with, or use of supply chains that include modern slavery and human trafficking. Cowater ensures all relevant parties undertake annual mandatory Code awareness sessions and are familiar with its appended policies, including on modern slavery and human trafficking.

## 9 Reporting

All Cowater employees and contractors have an obligation to report any suspected violation of the Code of Ethics and Professional Conduct, including modern slavery and human trafficking, as outlined in the Code.

Cowater commits to investigating and addressing all reported concerns regarding policy breaches, whether it pertains to employees and contractors, organizations working on Cowater's behalf, and/or any other third party or supply chain, in accordance with applicable laws.

As part of Cowater's reporting obligations, the Company is accountable for maintaining Key Performance Indicators (KPIs) on anti-slavery and human trafficking policies and procedures globally.