

## Modern Slavery & Human Trafficking Statement

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and sets out the actions taken by NuVira Earth Systems Ltd (“NuVira Earth”, “we”, “us”, “our”) to identify, prevent, and address modern slavery and human trafficking within our organisation and supply chain.

NuVira Earth Systems Ltd

Registered Office: 56 Guildford Street, Chertsey, England, KT16 9BE

Company Number: 16588791

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### 1. Introduction

NuVira Earth Systems Ltd is committed to conducting business ethically, responsibly, and in full compliance with all applicable laws. We do not tolerate any form of:

- modern slavery
- human trafficking
- forced or compulsory labour
- servitude
- child labour
- exploitation

We recognise that modern slavery is a global issue and that supply chains in the manufacturing and renewable energy sectors may face particular risks. We are dedicated to assessing and monitoring these risks and ensuring our operations uphold the highest standards of human rights.

### 2. Our Business and Structure

NuVira Earth Systems Ltd operates in the clean technology and renewable energy sector, supplying and distributing:

- solar panels
- inverters
- battery storage systems
- EV chargers
- smart energy products
- installation and after-sales support

We work with suppliers and manufacturing partners in the UK and internationally, including Europe, Asia, and other regions involved in renewable energy technology production.

### 3. Our Supply Chain

Our supply chain includes:

- raw material suppliers
- component manufacturers
- technology/firmware developers
- logistics and transportation providers
- installation partners and subcontractors
- professional service suppliers (legal, financial, IT, etc.)

We understand that some regions involved in electronics manufacturing present higher exposure to modern slavery risks. We therefore take proactive steps to ensure responsible sourcing and ethical practices across all partnerships.

#### 4. Our Policies on Modern Slavery

NuVira Earth has adopted internal policies that reflect our commitment to ethical business practices. These include:

##### 4.1 Anti-Slavery & Human Trafficking Policy

Prohibits the use of forced labour, child labour, or exploitative practices in any part of our organisation or supply chain.

##### 4.2 Supplier Code of Conduct

Requires all suppliers, contractors, and distributors to comply with our standards relating to:

- labour rights
- fair remuneration
- safe working conditions
- anti-slavery and anti-trafficking measures
- human rights protections

##### 4.3 Whistleblowing Policy

Provides a confidential channel for employees, suppliers, or partners to report concerns about unethical conduct or suspected modern slavery.

##### 4.4 Recruitment & Employment Practices

All recruitment is carried out internally or through reputable employment agencies. We ensure:

- no fees are paid by workers to secure employment
- right-to-work checks are conducted

- fair pay and working hours
- no retention of passports or personal documents

## 5. Due Diligence Measures

To identify and address modern slavery risks in our supply chain, we undertake the following due diligence:

- Assessing suppliers before appointment
- Mapping higher-risk regions and product types
- Reviewing supplier compliance with labour laws
- Requiring written contract clauses prohibiting slavery and trafficking
- Periodic audits or requests for third-party audit reports
- Ongoing monitoring of supplier performance For high-risk suppliers, we may:
  - request additional documentation
  - require enhanced transparency
  - perform site visits (directly or via partners)
  - terminate non-compliant relationships

## 6. Risk Assessment

We recognise that risks may arise in areas such as:

- electronics manufacturing involving global supply chains
- countries with weaker labour protection frameworks
- outsourced transportation and warehousing
- use of subcontracted labour in installation services

We continually evaluate these risks and take steps to mitigate them by improving visibility and strengthening requirements on suppliers.

## 7. Training & Awareness

We provide training to relevant staff, including:

- procurement teams
- operations and quality management
- installation partners
- leadership teams Training covers:
  - recognising indicators of modern slavery
  - reporting mechanisms
  - supply chain red flags

- responsibilities under the Modern Slavery Act

We aim to build awareness across the entire organisation to ensure all colleagues understand their role in identifying and preventing modern slavery.

## 8. Measuring Our Effectiveness

To assess the effectiveness of our actions, NuVira Earth monitors:

- supplier compliance and audit results
- any reported incidents or whistleblowing concerns
- completion of staff training
- risk assessments and corrective actions taken
- supplier contract renewals with updated anti-slavery commitments

Any breach of our anti-slavery standards results in immediate investigation and appropriate action, up to termination of the business relationship.

## 9. Future Commitments

In the next financial year, NuVira Earth aims to:

- implement enhanced supplier vetting tools
- increase transparency in higher-risk supply chains
- expand training programmes across wider teams
- introduce annual supplier declarations on anti-slavery compliance
- develop a full ESG (Environmental, Social, Governance) reporting framework

We remain committed to continuous improvement.

## 10. Statement Approval

This statement has been approved by the Board of Directors of NuVira Earth Systems Ltd and will be reviewed and updated annually.

Signed:

Name: H Balan

Position: Director

Date: 01/12/2025