

Modern Slavery and Human Trafficking Policy Statement



Introduction

EnerMech Group Ltd. is an international service company providing critical asset support to the energy and infrastructure sectors, with a significant presence in Europe, Asia, Australia, Africa, North America, Middle East and Caspian. A global presence means that we have come to recognise the importance of social responsibility within the communities in which we operate. Therefore, the enactment of the UK Modern Slavery Act 2015 and in particular the requirements of Section 54 are welcomed and embraced.

The International Labour Organisation (ILO) estimates that around 1.5 million people are subject to Modern Slavery within developed economies. We at EnerMech vehemently oppose and prohibit the use of human trafficking, child labour, slavery and slave labour, and in turn expect the same from our business partners and suppliers alike. As such we are committed to adopting and developing a zero tolerance approach with regards to any form of Modern Slavery and Human Trafficking, whether that be within our company or embedded within our Supply Chain.

2019 saw significant changes to EnerMech. We welcomed our new CEO Christian Brown and CFO Sandeep Sharma to the business and completed a restructuring programme to drive efficiency.

Compliance and Prevention

EnerMech Policies in relation to Modern Slavery and Human Trafficking

We have introduced a number of steps relevant to Modern Slavery, all of which are designed to ensure that our colleagues are familiar with and can spot the risks associated with Modern Slavery and Human Trafficking. EnerMech will continue to enrol employees that sit within certain functions in a Modern Slavery eLearning course and refresher training is provided every two years.

The EnerMech Code of Business Conduct is the overarching document that everybody working for EnerMech and its Subsidiaries must read and abide by at all times. Under the Code of Business Conduct, employees agree to adhere to all applicable laws and regulations.

Our Policies are all signed off at Director level and include the EnerMech Modern Slavery and Human Trafficking policy. This Policy sets out the EnerMech position on Modern Slavery and Human Trafficking and our responsibilities in relation to such matters. It aims to provide clear guidance and points to consider, assisting our colleagues to identify and minimise risk in regards to Modern Slavery and Human Trafficking.

The "Speaking Up" Policy encourages the reporting of any suspected wrongdoing in confidence and without fear of reprisal.

EnerMech has formed an Ethics Committee appointed by the CEO which meets twice annually to discuss the Compliance Programme and look at any changes that are required. This committee consists of Senior Management from across the Company. Modern Slavery is included within the remit of the committee.

Supply Chain

Throughout 2017 and 2018, EnerMech worked towards putting in place the necessary requirements to enable the prevention of Modern Slavery within our Supply Chain. Although specific departments within our organisation are responsible for ensuring compliance to the Act, we appreciate that all EnerMech employees are to be held accountable for ensuring that any acts of Modern Slavery or Human Trafficking are prevented. 2019 saw EnerMech develop a Supplier Code of Business Conduct which contains provisions on the fundamental rights of workers. This will be launched Q2 of 2020 and will be issued to all suppliers via Purchase Order.

EnerMech have identified high risk regions based on the Corruption Perceptions Index and know that these are the regions in which Modern Slavery and Human Trafficking are more prevalent. EnerMech have introduced a number of mitigating steps designed to help our Supply Chain identify the potential for Modern Slavery and Human Trafficking.

EnerMech have included questions on Modern Slavery in its Business Partner and Supplier Evaluation Questionnaires, allowing us to identify potential risks before they occur. We have also included Anti-Slavery provisions in our Global Terms and Conditions which are reviewed and updated regularly. Our suppliers are contractually required to comply with relevant laws and, where applicable, the relevant provisions of the Modern Slavery Act, alongside the EnerMech Code of Business Conduct. Their compliance is monitored via the Vendor Evaluation Questionnaire and through the Supplier contracting principles. EnerMech ensures supplier's awareness, understanding and adherence of these requirements is received through written confirmation.

Our People

All employees are privy to and held accountable for adhering to the EnerMech Compliance programme which includes receiving training on and adhering to the EnerMech Code of Business Conduct, and where applicable, key individuals must complete the EnerMech Modern Slavery training module. These, alongside various written policies that support the Code of Business Conduct are designed to create a culture of ethics and integrity, including the encouragement of "Speaking Up" to facilitate compliance with the laws of all jurisdictions in which EnerMech operates.

EnerMech's Goal

Our goal for 2020 is to continue with our Compliance Programme, and incorporate the following into our everyday business model;

- The continuation of the Ethics Committee where all business ethics related matters, including Modern Slavery, can be discussed and future developments can be proposed.
- The monitoring of our internal Code of Business Conduct and Modern Slavery training courses, and ensuring that all employees required to complete them do so.
- Ensure that all of our agents and business partners adhere to the EnerMech Code of Business Conduct requirements.
- The global launch of the Supplier Code of Business Conduct to ensure that our Suppliers are aware of and adhere to our standards.



A handwritten signature in black ink, appearing to be 'C. Brown', with a horizontal line underneath.

Christian Brown - Chief Executive Officer