

Modern Slavery and Human Trafficking Policy Statement



Introduction

We are a specialist service company delivering integrated solutions for complex energy and infrastructure projects. Delivering value to our customers by combining experts, equipment, IP, and technology across the entire asset lifecycle.

With more than 4,000 experts globally operating across 10 key service lines, the EnerMech Group of companies has 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.

This statement has been prepared and published on behalf of the EnerMech Group of Companies and its UK subsidiaries in accordance with the act for year ending 2021.

Supply Chains

As a Global organisation, the EnerMech supply chain includes local, national and international suppliers. 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. 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.

The services provided by EnerMech include Training, Hydraulics, Equipment Rental, Maintenance, Mechanical, Electrical and Instrumentation, Process and Pipeline, Commissioning, Integrity Management, Pipeline and Subsea, and Cranes and Lifting. Across these service lines, the supply chain includes original equipment manufacturers (OEM) and specialised equipment suppliers.

EnerMech is generally not a manufacturer of equipment and with the exception of bar and plate metal, does not rely on the provision of raw materials from within its supply chain. Where required, bar and plate metals are sourced from UK Distributors that use European Mills as the material source and in accordance with EN 10204 Standards.

EnerMech will only utilise suppliers that are on the Approved Vendor List and all suppliers must go through the supplier on boarding process which includes a number of mitigating steps designed to help our Supply Chain identify the potential for Modern Slavery and Human Trafficking.

1 EnerMech International Limited, EnerMech Holdings Limited, EnerMech Limited, EnerMech UAE Limited (UK), EnerMech Services Limited and Minteg Limited. Dormant entities include A1 Safety Training Consultants Ltd, Specialist Training & Maintenance Limited, Specialist Maintenance Services (Holdings) Ltd, Norson Hydraulic Services Ltd, Norson Power Ltd, Total Reclaim Systems Ltd, Norson Engineering Ltd, Norson Group Ltd, Norson Holdings Ltd and Rescom Technology Ltd.

Such measures include questions on Modern Slavery in the 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, the EnerMech Code of Business Conduct and the Supplier 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.

Compliance and Prevention

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 Code of Business Conduct

Our Supplier Code of Business Conduct is designed to be a practical and clear guide to the behaviour that EnerMech expects from our suppliers and subcontractors, and their people. The Supplier Code includes a dedicated section on Legal and Employment Standards that requires suppliers to allow for the fundamental rights granted to workers under applicable local laws. This means that EnerMech does not purchase products from any firm that exploits individuals. EnerMech ask that suppliers and subcontractors regularly monitor compliance with this code and notify the company if any issues arise or if there are any concerns regarding compliance with it. If a supplier or subcontractor is found to have violated this code, EnerMech may ask the supplier for further information relating to the issue and show what actions have been taken to remedy this. EnerMech recently updated the Supplier Code of Business Conduct to include a signatory page so that its suppliers will need to confirm they have read and will adhere to the Code

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Environment, Social & Governance (ESG) Committee

In 2021 we established an Environmental, Social and Governance Committee ("ESG Committee") that consists of our Senior Leadership Team who will each lead and/or participate in the topics relevant to their role. Several of the standards set out in the ESG Committee are relevant to Modern Slavery & Human Trafficking, including Human Rights, Labour Practices and Business Ethics. To promote awareness of ESG and the applicable topics, regional ESG support teams will assist in cascading the ESG programme throughout the organisation and encourage engagement and direction. Outputs of the ESG Committee will, among other things, include an annual ESG report.

The Speaking Up Policy

At EnerMech we are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible. EnerMech therefore maintain a Speaking Up Policy which aims to encourage staff to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously, investigated as appropriate, and that their confidentiality will be protected. The Speaking Up Policy helps employees by outlining the process they should follow should they wish to Speak Up. In the first instance, it may be appropriate to raise concerns with a Line Manager, in some situations however, it may be appropriate to contact the Compliance Department who will arrange a meeting as soon as possible to discuss the concerns. A person who chooses to Speak Up in line with the Speaking Up Policy should do so in the knowledge that their concerns will be handled confidentially at all times and will not suffer any detrimental treatment as a result of raising a genuine concern.

Training and Communications

EnerMech previously developed a stand-alone eLearning module on Modern Slavery & Human Trafficking. This module was to be rolled out to employees that sit within certain functions such as Supply Chain and Business Development and to all employees named in the company Authority Matrix. The launch of the Modern Slavery & Human Trafficking eLearning Module in 2021 was postponed for reasons out with the control of the business. This is now a priority topic, and we aim to launch the module by the end of Q3/Q4 2022.

The Compliance Department has previously issued monthly compliance bulletins to the wider business which focus on a particular element of the Compliance Programme and the Code of Business Conduct, providing an overview of the topic, the risk to EnerMech and what we can do to reduce the likelihood of a breach. Modern Slavery & Human Trafficking has previously been the subject of such bulletins and will continue to be.

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 Goals:

- Our goal for the year ahead is to continue with our Compliance Programme and incorporate the following into our everyday business model:
- The continuation of the Environmental, Social & Governance Committee where all business ethics related matters, including Modern Slavery, can be discussed and future developments can be proposed.
- The re-launch of the Modern Slavery & Human Trafficking training module.
- Increased focus on Supply Chains and supplier on-boarding, with a view to ensuring each region is aligned in the processes followed.



Christian Brown - Chief Executive Officer