

# Modern Slavery and Human Trafficking Policy Statement



Safer • Smarter • Solutions

## 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 in developed economies and 50 million people worldwide are subject to Modern Slavery. 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<sup>1</sup> in accordance with the act for year ending 2022.

## 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.

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<sup>1</sup> 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.

EnerMech<sup>2</sup> 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 onboarding process which includes a number of mitigating steps designed to help our Supply Chain identify the potential for Modern Slavery and Human Trafficking. 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 the Modern Slavery Act, all relevant laws, 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.

### **1. The Code of Business Conduct**

The EnerMech Code of Business Conduct applies to all EnerMech personnel engaged by EnerMech worldwide. This includes the Directors, Officers and employees of the EnerMech Group of companies, Joint Venture partners, Agents, Strategic Alliances, and representatives. It also applies to Contractors, Consultants, Intermediaries and Agents retained by EnerMech. The Code of Business Conduct will be updated in 2023 to better represent EnerMech's zero tolerance approach to Modern Slavery & Human Trafficking.

### **2. The Modern Slavery and Human Trafficking Policy**

As part of our efforts to prevent Modern Slavery and Human Trafficking, a Modern Slavery and Human Trafficking policy was developed in response to the Modern Slavery Act in 2018.

This Policy provides our employees with an overview of the EnerMech position on the topic, things to consider and how to report concerns.

### **3. The Supplier 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 comply with 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

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<sup>2</sup> Refers to the UK entities listed in footnote 1.

or subcontractor is found to have violated this code, EnerMech may ask the supplier for further information relating to the issue and show what remedial actions have been taken. EnerMech's Supplier Code of Business Conduct includes a signatory page so that its suppliers need to confirm they have read and will adhere to the Code.

#### 4. 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.

#### 5. 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.

The Speaking Up Policy was reviewed and updated in March 2023, with the updated version being uploaded to the document register and distributed electronically to all employees.

#### 6. 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 was postponed for reasons out with the control of the business. In 2022, the business took the decision to move our Learning Management System to a new provider during 2023 and the Modern Slavery & Human Trafficking Course will be updated, and all appropriate learners enrolled in the new course when launched.

The Compliance Department issues regular compliance bulletins, including those for Modern Slavery & Human Trafficking, 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.

## 7. 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 on the/our new Learning Management System.
  - Increased focus on Supply Chains and supplier on-boarding, with a view to ensuring each region is aligned in the processes followed.
  - A review of the Code of Business Conduct and Modern Slavery and Human Trafficking Policy to be undertaken and updated documents distributed electronically and in person to all employees as appropriate.



**Christian Brown**

**Chief Executive Officer**