

# 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.

## Compliance and Prevention

Throughout 2017 EnerMech has 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, ultimately, we appreciate that all EnerMech employees are to be held accountable for ensuring that any acts of Modern Slavery or Human Trafficking are prevented. Varying levels of due diligence are carried out to address any possible Supply Chain issues, depending on the potential risk presented by that particular Supplier.

Our Suppliers are contractually required to comply with relevant laws and, where applicable, to the relevant provisions of the Modern Slavery Act, alongside the EnerMech Code of Business Conduct. Their compliance is monitored via the Approved Vendor Questionnaire and through the Supplier contracting principles. EnerMech ensures Suppliers awareness, understanding and adherence of these requirements is received through written confirmation.

## Supply Chain

Throughout 2017 and 2018, EnerMech has 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. EnerMech has identified high risk regions based on the Corruption Perceptions Index and knows that these are the regions in which Modern Slavery and Human Trafficking are more prevalent.

EnerMech has introduced a number of mitigating steps designed to help our Supply Chain identify the potential for Modern Slavery and Human Trafficking.

EnerMech has 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 provisions in our Global Terms and Conditions, by means of specific reference to the Modern Slavery Act 2015.

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.

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## 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 has also developed a Modern Slavery and Human Trafficking eLearning Module which has been designed to raise awareness and understand the red flags that may indicate Modern Slavery and Human Trafficking. The criteria used to determine personnel that are required to complete this training are based on the department and role undertaken by each individual.

## EnerMech's Goal

Our goal for 2019 is to continue with our Compliance Programme, and incorporate the following into our everyday business model;

- The establishment of an Ethics Committee which comprises of senior members of staff 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.
- Undergo in-depth risk assessments of our major suppliers to further establish where the risk of Modern Slavery lies within our Supply Chain and ensure that the correct procedures are in place to prevent any future risks.

A handwritten signature in blue ink that reads 'Doug Duguid'.

**Doug Duguid - Chief Executive Officer**

