

Modern Day Slavery Statement

Introduction

This statement sets out the Petroplan Group's commitment to:

- a) Understanding the potential modern slavery risks related to its business and
- b) Implementing and maintaining company processes to preclude any slavery or human trafficking from occurring within its business and its supply chains.

This statement relates to Petroplan's business activities during the financial year ending December 2018.

As a member of the recruitment industry, the Petroplan Group recognises its responsibility to take an uncompromising approach to slavery and human trafficking, with zero tolerance for trafficking in people. The Petroplan Group is committed to not only preventing slavery and human trafficking in its own corporate activities, but also to ensuring, insofar as possible, that its supply chains are free from slavery and human trafficking activities. As a demonstration of our commitment to this cause; one of the charities supported by the Petroplan Group is "A 2nd Cup" – a charity supporting survivors of human trafficking.

Organisational Structure and Supply Chains

This statement covers the activities for the Petroplan Group and its ultimate parent company Petroplan Holdings. The Petroplan Group has around 80 employees worldwide, supplying recruitment services and managing placements via our worldwide network of offices throughout Europe, North America, the Middle East and Africa. The Petroplan Group is a member of The Association of Professional Staffing Companies (APSCO) and our Quality Management system is ISO 9001:2015 accredited. Providing specialist recruitment services exclusively within the oil, gas and energy sector since 1976, the Petroplan Group has exceptional technical expertise and the experience to deliver services in line with our global clients' expectations.

Our supply chains include, but are not limited to, companies sourcing candidates for our clients. This may involve the introduction of external agencies to the Petroplan Group for onward supply to our clients. We therefore expect our suppliers to operate in a principled, legally compliant and professional manner by adhering to our Supplier Code of Conduct, and to advocate similar standards within their own supply chains. The Petroplan Group relies on its staff to be vigilant in monitoring potential risks, with staff expected to immediately report any concerns, in line with the relevant company policies and procedures.

Assessment of Risk

The Group assesses whether or not particular activities or countries are particularly high-risk in relation to slavery or human trafficking. In doing so, consideration is given to the services provided over the duration of the contract and the supply chain involved. Consideration is also given to suppliers' current compliance through a review of their website, their code/s of conduct and other available information, including:

- A code of conduct that addresses slavery
- Sourcing policies that address slavery
- Demonstrable management processes in place to manage the risk of slavery in their supply chain
- Modern slavery risks or occurrences identified by the media or risk monitoring organisations

Responsibilities

Responsibilities for the Petroplan Group's anti-slavery initiatives are as follows:

- **Policies:** The **CEO** is responsible for ensuring Group policies are up to date and reflective of the Modern Slavery Statement.
- **Risk assessments:** In line with Petroplan's ISO-accredited integrated Quality Management system and as appropriate, the Group undertakes risk assessments in relation to our business activities and suppliers.
- **Due Diligence:** The **Regional Business Support Managers** are responsible for ensuring that all the appropriate due diligence is undertaken in respect of identifying any risk of slavery and/or human trafficking within our supply chains.
- **Notices:** The **Bid Manager** will receive awareness notifications in respect of Petroplan's responsibilities regarding slavery and human trafficking in the supply of services and in receipt of services from suppliers and will disseminate this information to the wider business as appropriate.

Relevant policies and procedures

Petroplan's Guide to Business Conduct sets out the company's position on business ethics and its approach to the identification of modern slavery risks and steps to be taken to prevent such activity; some policy extracts are included below:

- **Whistleblowing and Duty to Report:** Petroplan's Guide to Business Conduct empowers its workers, customers and other stakeholders to report any concerns about the company's business activities or its supply chains. This includes anything that may increase the risk of slavery or human trafficking. The Petroplan Group's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of any negative consequences.
- **Human Rights and Labour Policy:** Petroplan supports and respects the protection of internationally proclaimed human rights for all, including the basic human rights of the employees and workers within our supply chain. We believe in treating people with respect and dignity and do not condone the use of our services to infringe on the basic human rights of others. We expect our suppliers to adhere to these same standards and take reasonable steps to ensure that they do.
- **Supply Chain:** Petroplan purchases goods and services from a variety of suppliers (local and international) and we seek to promote the application of our core company values in all our interaction with these suppliers. We are committed to encouraging suppliers to adopt business policies that align with our Guide to Business Conduct.

In addition to our Guide to Business Conduct, Petroplan's HSEQ & SR Policy, our Employee Handbook and our Risk Assessment Procedure all underpin our commitment to the avoidance of slavery and human trafficking risks within our business.

Supplier Code of Conduct

All our suppliers must agree to Petroplan's Supplier Code of Conduct, which provides that they will:

- Refrain from holding any person in slavery or servitude or from enforcing any forced or compulsory labour;
- Not abet or facilitate the trafficking of any persons;
- Not in any way associate with companies using involuntary labour or participating in human trafficking;
- Treat and reward employees equally on the basis of the quality of their work;
- Provide a safe, hygienic and healthy working environment for all employees;
- Provide, as a minimum, rates of pay at national legal standards; and
- Comply with the applicable national and regional laws and regulations at all times.

Due diligence

The Petroplan Group undertakes the appropriate due diligence in the provision of workers to clients and in working with clients, taking on new suppliers, and monitoring its existing supply chain as appropriate.

The organisation's due diligence process includes the following elements:

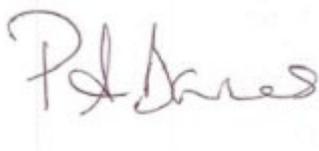
- broadly mapping the supply chain to assess the regional risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier's activities;
- conducting an annual risk profile review for each supplier.

Internal Awareness

General communication of Petroplan Group policies and procedures is facilitated by either email, briefings, presentations or classroom training as appropriate.

Specifically, awareness of the Group's position on modern slavery and human trafficking is communicated to all staff at induction, with Petroplan's policies and procedures in this regard stored centrally on the company's HR system and required for signed acknowledgement by all new starters.

This statement has been approved by the Petroplan Group Board of Directors, who will review and approve the statement annually.

A handwritten signature in blue ink, appearing to read "Philippa Barnes".

Philippa Barnes (CEO)

Date: 1st July 2019