

## **Statement of the Board of Directors of Acteon Group Limited (the “Company”) in accordance with section 54 Modern Slavery Act 2015**

This Statement is intended to communicate the steps that the Company has taken during its financial year ended 31 December 2017 to ensure that slavery and human trafficking are not occurring in any part of its supply chains or in any part of its business.

### *Company Structure*

The Company is the parent company of a number of UK and non-UK entities (the “Group”) operating as part of the supply chain for the provision of goods and services principally for the offshore and onshore oil and gas industry and also for other forms of offshore and near-shore installations.

The Company is a non-operational holding company; other members of the Group supply goods, services and manpower/personnel to their customers and procure certain goods and services from their suppliers. They operate as branded businesses, including Intermoor, Aquatic, 2H Offshore, Seatronics, UTEC, Team Energy, LDD, LM Handling, Conductor Installation Services, Subsea Riser Products, Menck, Probe, J2 Subsea and Pulse. Employees of the Group are predominantly highly skilled staff, most of whom have formal qualifications in their particular disciplines and many of whom are required to hold various onshore and offshore related permits and certificates in order to be able to carry out their duties.

### *Company Policy*

The Company is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of the Group’s business. The Company adopted an Anti-Slavery Policy in 2017 which reflects its commitment to act legally, ethically and with integrity in all its business relationships and confirms its commitment to comply with the requirements of the Modern Slavery Act 2015. The Anti-Slavery Policy is included in the wider Business Principles of the Company, to which it adheres. It requires that all of its suppliers adhere the same or similar principles.

In addition, the Company issued a Supplier Code of Conduct in 2017 and requires its suppliers to confirm compliance with the principles set out in that Code.

### *Awareness and Training*

To enhance the understanding of the risks of modern slavery and human trafficking in the supply chains and the various businesses of the Group, the Company:

- has included its Anti-Slavery Policy and its Supplier Code of Conduct in its employee compliance handbook and in the induction arrangements for its staff; and
- assesses the risks from its supply chains on a continuous basis.

## *Oversight Risk Review*

The Company works globally, principally for oil majors, independent producers, national oil companies, international and local contractors (construction and drilling); the Board considers the risk of slavery and human trafficking in these larger or multinational customers to be small.

The Company's supplier base of approximately 8,000 comprises a large, complex and varied range of companies across the globe and the Board considers that areas of risk could include manual labour used by suppliers of industrial goods (mooring chains, for example), the extraction of metals used in goods purchased from original equipment manufacturers or in loading/discharging of cargo in ports and the provision of yard services in higher risk geographies.

Whilst the contractual documentation used by the Group requires suppliers to comply with applicable laws, steps are being taken to clarify the wording which deals specifically with the issues covered by the Modern Slavery Act. The continual risk review is and will continue to be designed to enable the identification of any specific risks or issues. Any risks or issues found will be addressed as and when they are identified. In addition, we continue to review contractual terms put to us and, if required, seek to clarify and amend.

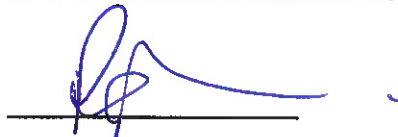
## *Assurance*

The Group operates a "non-retaliation policy" in relation to concerns raised by staff and utilises a third-party-administered hotline which enables anonymous and confidential reporting by employees of any ethics and compliance concerns, including those in relation to slavery and human trafficking.

## *Approval*

I, Richard Higham, hereby certify that the information contained in the above FY2017 Anti-Slavery and Human Trafficking Statement is factual and has been approved by the Board of Directors of Acteon Group Ltd on 17th April 2019.

This Statement will be reviewed annually.



Richard Higham, Director,  
for and on behalf of the Board

23 April 2019