

**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 2016 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 Group supplies goods, services and manpower/personnel to its customers and procures certain goods and services from its suppliers. The group predominantly employs highly skilled staff most of whom have formal qualifications and 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 has therefore adopted an Anti-Slavery Policy 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. This Anti-Slavery Policy is included in the wider Business Principles the Company has prepared and published and which it adheres to and expects its suppliers to adhere to. In addition, the Company is to issue a specific Supplier Code of Conduct in late 2017 and will require its suppliers to confirm compliance with that Code.

Awareness and Training

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

has included the Anti-Slavery Policy in its employee compliance handbook;

is preparing to provide training to its employees; and

is in the process of carrying out a risk assessment of the supply chains in the Group.

Initial Risk Review

We work globally for oil majors, independent producers, national oil companies, international and local contractors (construction and drilling) and the Board considers the risk of slavery and human trafficking in the larger or multinational customers as small.

Our suppliers comprise a large and varied selection of companies across the globe and the Board considers that areas of risk could include manual labour used by suppliers of industrial goods (for example mooring chains) 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, our risk review will be designed to identify any specific risks or issues. Any risks found will be addressed as and when they are identified. In addition, contractual terms will be reviewed and, if required, clarified.

Assurance

The Group utilises a third-party-administered hotline allowing for anonymous/confidential reporting of ethics and compliance concerns, including in relation to slavery and human trafficking, by employees.

Approval

I, Richard Higham, hereby certify that the information contained in the above FY2016 Anti-Slavery and Human Trafficking Statement is factual and has been approved by the Board of Directors of Acteon Group Ltd on 8th November 2017.

This Statement will be reviewed annually.



Richard Higham, director,

for and on behalf of the Board

Date: *11 Dec. 2017*