

Statement of Board of Directors of Acteon Group Limited in accordance with section 54 Modern Slavery Act 2015 for the financial year ending 31 December 2019

Acteon Group Limited (“**Acteon/we**”) will not support or deal with any business knowingly involved in slavery or human trafficking. This statement sets out the steps we continue to take to ensure that slavery and human trafficking is not present in our supply chains or in any part of our business.

Structure of our business and supply chains

Acteon is the non-operational parent company of several UK and non-UK entities (the “**Group**”) operating as part of the supply chain for the provision of goods, services, and labour to the renewable, nearshore construction and oil and gas sectors.

The Group trades through the following trading brands¹:



¹ 2H Offshore Engineering, Aquatic Engineering and Construction, Benthic, Conductor Installation Services, Clarus, Claxton Engineering Services, Core Grouting Services, Deepwater, InterAct, InterMoor, J2 Subsea, Large Diameter Drilling, LM Handling, MENCK, Probe Oil Tools, Pulse Structural Monitoring, Seatronics, Subsea Riser Products, TEAM Energy and Resources, Terrasond and UTEC.

Acteon develop and engineer solutions and integrated services using data and knowledge-based insight across our customers' dynamic floating and fixed physical infrastructure.

The Group and its entities are therefore separated into two areas of business application:

- INFRASTRUCTURE products and services help our customers by physically interacting with marine and subsea assets to address challenges from the seabed to surface throughout the life of a project. This can include hiring out equipment such as hydraulic hammers or mooring/anchors to designing, engineering and fabricating specialist components.
- INSIGHT products and services use information, domain knowledge and expertise or data to extract value for our customers. This can include monitoring of subsea infrastructures, risk-based inspection planning, and geotechnical surveying and reporting.

Our customers include global operators, developers, and contractors. We utilise suppliers to assist in offering these capabilities to our customers. We are also supported by business partners (which include agents, distributors, and joint venture partners) across the world, particularly in emerging markets.

Policies on modern slavery

We understand the importance of applying systems and controls to ensure slavery and human trafficking are not part of our supply chains or our own business. Our approach and commitment are communicated across the Group via our [Anti-Slavery Policy](#) which was adopted in 2017. The Anti-Slavery Policy also forms part of Acteon's Compliance Handbook which is accessible to all staff via Acteon's Human Resources portal. Staff are required to confirm, via the portal, that they have read and understood the contents of the handbook.

Acteon upholds a policy of non-retaliation or victimisation against anyone who reports concerns about slavery and human trafficking. Staff can report these concerns in various ways including to line managers, compliance advocates within their respective businesses, Acteon's compliance team, or via Acteon's third-party operated compliance helpline and confidential web reporting system.

Business partners are also made aware of our slavery and human trafficking commitments and are asked to provide contractual assurances that they too will uphold the same standards in their business and supply chains.

Due diligence processes

Following the introduction of the Modern Slavery Act 2015, due diligence processes were updated and improved in the UK to include robust wording in contracts with suppliers, questions on slavery and human trafficking in supplier questionnaires as well as letters sent to existing suppliers to question what steps they were taking in relation to the requirements under the Modern Slavery Act 2015.

Our updated supplier due diligence process is now well established in the UK and designed to ensure that we only work with those suppliers who uphold the same standards and conduct similar processes to ensure that slavery or human trafficking is not part of their own business or supply chains. Specifically, in relation to slavery and human trafficking, supplier questionnaires include questions such as:

- confirmation that the supplier does not use slavery or forced/compulsory labour;
- what steps the supplier takes to investigate its own supply chain and to eradicate slavery and human trafficking within its organisation and/or supply chain;

- confirmation that the supplier has a policy or statement dealing with the issue of slavery and human trafficking; and
- a request to provide a copy of their own slavery and human trafficking statement or confirmation that they are not required to prepare one.

Robust slavery and human trafficking obligations are also built into contracts with our suppliers in the UK as standard.

All business partners go through a strict process in order to be considered as approved partners. The process includes risk-based due diligence coordinated and collated by the Acteon compliance team. Due diligence includes screening on companies and relevant individuals against a range of risks which might flag issues otherwise not disclosed. Slavery and human trafficking obligations also form part of the contractual agreements with business partners.

Auditors of suppliers and business partners are also made aware to look for any signs of slavery or human trafficking and to report any concerns accordingly.

Risk Assessment

Risk is assessed by considering several factors but primarily the scope of work and the locality. Tools such as the Global Slavery Index are used to assist in assessing the risk level of the locality of the work (www.globalslaveryindex.org).

Acteon acknowledges that the risk of slavery and human trafficking in our core supply chains is low due to the highly skilled nature of a lot of the work and the localities in which that work is sourced. However certain pockets of risk have been identified, for example, procurement in less familiar geographies or for scopes of work including vessels where low skilled manual labour may be utilised.

Measuring effectiveness

We undertook an audit of the majority of our UK companies, in which they were asked to confirm the following with reference to the financial year 2019:

- Actions taken to minimise the risk of slavery or forced labour in your supply chain;
- Details of any documented policies you have in place (e.g. Supplier Code of Conduct) which seek to reduce the risk of slavery or forced labour in your supply chain;
- Details of due diligence processes carried out, initiated or (existing processes) amended;
- The status of risk assessments analysing the relevant risks in your supply chain, details of the severity of risks identified and how you mitigate or plan to mitigate these risks;
- Any key performance indicators (KPIs) you have introduced or plan to introduce to measure your progress in mitigating risks identified;
- Any staff training carried out or planned covering awareness of this subject; and
- Confirmation that you have completed any outstanding actions from previous years.

The responses demonstrated a high level of awareness and compliance with Acteon's policies and processes on slavery and human trafficking. It also showed that actions were taken and encouraged outside of those specifically requested by Acteon (such as additional training).

Risk assessments and due diligence processes continued to assess the risk as low in most circumstances.

Training for staff

Induction training is given to all staff on all areas covered by the Acteon Compliance Handbook (including slavery and human trafficking). Within that training, staff are encouraged to report all concerns via one of the reporting routes available (and set out above in the policies section of this statement).

Continued improvements

Acteon has identified that further improvements could be made to strengthen the existing policy and processes on slavery and human trafficking. These include:

- widening the focus of the programme to ensure all companies within the Group are fully aware of the expectations and processes surrounding slavery and human trafficking, as the focus to date has been on the UK companies within the Group;
- reviewing and (if required) updating the Anti-Slavery Policy to ensure it is up to date and easily accessible to all;
- updating the Acteon Supplier Code of Conduct to include all of Acteon's ethical and legal expectations (which will include modern slavery) and communicating this to the Group;
- reviewing and (if required) updating the risk assessment template to enable the Group to improve monitoring, assessment and actions taken on any risks of slavery or human trafficking both in its own business and its supply chain;
- setting up a programme of regular overview training for all staff to ensure they know how to identify slavery and human trafficking and how to raise any concerns; and
- setting up a programme of regular bespoke training for staff who are identified as requiring a more detailed knowledge and understanding of slavery and human trafficking to ensure they know what is expected of them and how they can ensure that the business and its supply chains are not knowingly involved in slavery, servitude, forced or compulsory labour or human trafficking.

Acteon will work with the Group on making these improvements and will report on progress in its next slavery and human trafficking statement.

I, Carl Trowell, hereby certify that the information provided in this slavery and human trafficking statement is accurate and has been approved by the board of directors of Acteon Group Limited on 10 August 2020.



Carl Trowell, Group Chief Executive

For and on behalf of Acteon Group Limited

Date: 10 August 2020