



MODERN SLAVERY STATEMENT YEAR ENDING 31 DECEMBER 2021

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 2021

ACTEON

www.acteon.com

MODERN SLAVERY STATEMENT

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 taken to ensure slavery and human trafficking is not present in our supply chains or any part of our business.

STRUCTURE OF OUR BUSINESS AND SUPPLY CHAINS

Acteon provides specialist engineering, services and technology to companies who develop and own marine infrastructure across the life of their assets. We enable our customers to achieve their operational goals with a more efficient integrated solution: reducing the cost and carbon footprint through value engineering without compromising the quality of delivery. Acteon delivers support through the following service divisions¹.



DATA AND ROBOTICS

Acteon’s Data and Robotics division provides a suite of smart solutions for the entire lifecycle of an asset, including advanced geotechnical and geophysical site investigation, surveying, subsea electronics and robotics, and asset integrity monitoring.



ENGINEERING, MOORINGS AND FOUNDATIONS

Acteon’s Engineering, Moorings and Foundations division delivers a complete service from initial concept engineering through design, fabrication, and on to marine installation.



ENERGY SERVICES

Acteon’s Energy Services division supports oil and gas and other offshore energy sectors. We bring bespoke solutions to maximise an asset’s performance, often towards the end of its production life through structural improvements, corrosion protection retrofitting and eventual decommissioning.

Our customers include global operators, developers, and contractors. We utilise suppliers to assist in offering these capabilities to 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

¹ DATA AND ROBOTICS includes the segments Geo-services (UTEC, Benthic and TerraSond) and Electronics and Tooling (Seatronics and J2 Subsea) and the business unit Structural Monitoring (Pulse Structural Monitoring). ENGINEERING, MOORINGS AND FOUNDATIONS includes the segments Advanced Systems Engineering (2H Offshore Engineering, Clarus Subsea and InterAct PMTI), Mooring and Anchors (InterMoor and Bruce Anchor) and Marine Foundations (MENCK and Large Diameter Drilling). ENERGY SERVICES includes the segment Cutting and Decommissioning (Claxton Engineering Services and Probe Oil Tools) and the business units Flex-Lay and Retrieval (Aquatic Engineering and Construction), Corrosion Management (Deepwater) and Energy Resourcing (TEAM Energy Resources).

the Group via our Anti-Slavery Policy which was adopted in 2017 and updated in 2021. 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 annually 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 leads/advocates, 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.

DUE DILIGENCE PROCESSES

Our updated supplier due diligence process is now well established in the UK and designed to ensure we only work with suppliers who uphold the same standards and conduct similar processes to ensure slavery or human trafficking is not part of their own business or supply chains. We also include robust wording in supplier contracts. We ask:

- for confirmation the supplier does not use slavery or forced/compulsory labour;
- what steps the supplier takes to investigate its own supply chain;
- for confirmation the supplier has a policy or statement on slavery and human trafficking; and
- for a copy of their own statement or confirmation they are not required to prepare one.

During 2021, the Acteon Procurement Transformation (APT) project sought to harmonise and standardise procurement processes across the Group. As part of the APT project, a comprehensive supplier questionnaire has been devised with a section dedicated to understanding a supplier's knowledge of and commitment to ensuring modern slavery and human trafficking is not present in their own supply chains or any part of their business. The APT project is therefore facilitating the roll out of the already well-established processes in the UK to the rest of the Group.

All business partners go through a strict approval process which includes risk-based due diligence such as screening against a range of risks (e.g. sanctions, adverse media, regulatory action). Slavery and human trafficking obligations also form part of the contractual arrangements.

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 locality. Tools such as the Global Slavery Index are used to assist in assessing risk level (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 internal audit in 2022 asking the following with reference to the financial year 2021:

- Actions taken to minimise the risk of slavery or forced labour;
- Details of documented policies (e.g. Supplier Code of Conduct) seeking to reduce the risk of slavery or forced labour;
- Details of due diligence processes completed, initiated or (existing processes) amended;
- Status of risk assessments analysing relevant risks, details of the severity of any risks identified and plan to mitigate risks;
- KPIs introduced or to be introduced to measure progress in mitigating any risks identified;
- Staff training completed or planned; and
- Confirmation of completion of 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 and a move towards standardisation in processes across segments where practices may previously have differed.

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 (and set out above in the policies section of this statement).

Acteon will continue to work with the Group on making improvements. Acteon is also committed to establishing a sustainable ESG strategy which includes a focus on the social impact Acteon has both to individuals within its own business and its supply chains. Measures concerning the prevention of modern slavery and other forms of human exploitation are part of this strategy.

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 7 June 2022.



Dr Carl Trowell, Group Chief Executive

For and on behalf of Acteon Group Limited

Date: 7 June 2022