

Modern Slavery Act Public Statement

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that ODE Group has taken and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

ODE Group and its subsidiaries (hereafter known as ODE Group) have a zero-tolerance approach to slavery and are committed to acting ethically and with integrity in all our business relationships to ensure slavery is not taking place in the business or the supply chain.

We are committed to respecting internationally recognised human rights, including fundamental labour rights and international labour standards as set out in the Universal Declaration of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

We expect the same high standards from our contractors, suppliers and other business partners, and as part of our contracting process we include specific prohibitions against the use of forced labour, compulsory or trafficked labour, or anyone held in slavery or servitude.

Our Supply Chain

The potential risk of modern slavery affecting a company's supply chain is influenced by the level of activity being carried out in each country. For ODE Group this activity ranges from supply of personnel into client organisations through to undertaking onshore and offshore development projects and production operations.

We rely on international suppliers, as well as local suppliers in our countries of operation, to deliver key components of our operations, for example, logistics, engineering and construction, operations and maintenance, IT, communications and other services. We continue to focus on creating improved access to supply chain opportunities for local suppliers, including direct spending with locally registered international firms and joint ventures between local and international firms.

Our supplier approval process incorporates a review of controls undertaken by that supplier to ensure that there is no evidence of slavery or human trafficking. The company will not support or deal with any business involved in slavery or human trafficking.

Recruitment

We conduct robust checks on any new employee – including eligibility to work in the UK or respective company they are employed and to safeguard against human trafficking or individuals being forced to work against their will.

Employment

The company is committed to complying with Minimum and Living Wage legislation and prohibits the use of child labour in accordance with the International Labour Organisation Standard (minimum age of 15 years).

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Governance and Standard

ODE Group is governed by its Group Board, which approves the company's strategy, determines its key policies and reviews management and financial performance. The following policies relate to safeguarding against modern slavery risk: -

- Our **Code of Conduct** prohibits the use of underage, forced or bonded labour and sets out our expectations on respect for fundamental labour rights and freedom from harassment. The Code also sets out our commitment to conducting appropriate due diligence on our suppliers in respect of risks related to human rights and labour conditions. All suppliers are required to perform their work in a manner consistent with the Code and their performance is subject to ad-hoc audit.
- Our **Supply Chain Management System** sets out minimum requirements for the placement of contracts for goods, works and services, and our Group Supplier Due Diligence process sets out due diligence requirements in respect of human rights and labour conditions.

Training

All staff are required to familiarise themselves with the Company's Code of Conduct as part of the induction process and where applicable individuals received further enhanced training on the Code of Conduct to provide greater awareness. Specific training may be undertaken following specific risk assessments.

Approval of this statement

The statement has been approved by the Board of ODE Group.