

MODERN SLAVERY ACT POLICY



Introduction

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that ODE Asset Management (ODE AM) has taken and will continue to take, along with new initiatives, to ensure modern slavery and human trafficking is not present within its business or supply chain.

Our Business

ODE AM's main office is at Nelson House, Beevor Road, Great Yarmouth, Norfolk NR30 3QQ. We provide design, engineering, project management and procurement services including the management systems in support of Operational Support and construction site management to the International Oil, Gas, Renewable and Energy Industries.

ODE AM is governed by its board of directors and ultimate parent company, DORIS Group, which approves the company's strategy, determines key policies, and reviews management and financial performance. The safeguarding against modern slavery is of paramount importance to and is instilled within the policies of ODE AM and DORIS Group.

Our Values

We have a zero-tolerance approach to slavery and are committed to respecting and promoting internationally recognised standards of human rights, including those fundamental labour rights and international labour standards as set out in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

We explicitly:

- prohibit the use of child / under-age labour;
- prohibit the use of forced prison or compulsory labour;
- prohibit the payment of recruitment fees by workers;
- prohibit any form of discrimination, harassment or retaliation;
- promote a safe, secure and healthy workplace;
- provide wages and benefits that meet or exceed the national legal requirements; and
- comply with all applicable laws and regulations regarding the freedom of movement, association and collective bargaining.

Our Supply Chain

We rely on local and international suppliers to deliver key components of our operations, such as 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 entities and the promotion of joint ventures between local and international organisations.

We expect and demand our contractors, suppliers and other business partners to adhere to, and promote, the same high standards of ethical operations that ODE AM practices. Recognising the importance of proactive counterparty due diligence, ODE AM completes assessment of all business partners prior to their engagement, with more detailed assessment completed on entities deemed to represent a higher risk for labour rights issues.

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Recruitment and Employment

We conduct robust checks on every new employee to confirm their eligibility to work in the United Kingdom and to safeguard against human trafficking or individuals being forced to work against their will. We are committed to complying with Minimum and Living Wage legislation and we ensure our values are rigorously adhered to throughout all recruitment and employment processes.

Code of Conduct

ODE AM has adopted DORiS Group's Code of Conduct, with copies being made available to all employees, advisors, contractors, and support personnel, across all our premises in addition to being available electronically via our website and intranet. The Code of Conduct formalises our values and sets out the expectations of all employees, contractors, and business partners.

Without exception, all staff are required to familiarise themselves with, and at all times comply with, our Code of Conduct.

Training

All employees receive Code of Conduct training as part of their induction process. We then have a risk-based further training programme, with individuals most at risk of exposure to unethical practices (such as our colleagues within the Supply Chain team), receiving enhanced training. Further specific training may be undertaken following work scope specific risk assessment.

Online training modules addressing, amongst other things, Modern Slavery, have been implemented along with refresher training for at risk individuals.

Reporting Concerns / Whistleblowing

We are committed to maintaining an environment where concerns can be raised and are listened to and acted on without fear of reprisal. If any individual has any concerns of modern slavery within our operation, they are encouraged to utilise our whistleblowing system. All comments received via this system are treated as completely confidential and are reviewed by a panel of senior compliance personnel from across the DORiS Group.

Approval of this statement

This Policy has been approved by ODE AM's Managing Director on behalf of ODE AM's Senior Management Team.



Sandy Reid, Managing Director