

Revision 3 | June 2024

# Lamprell modern slavery and human trafficking policy statement

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General Counsel & Company Secretary



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## For the year ended 31 December 2023

### 1. Background to our Policy Statement

- 1.1 Modern slavery encompasses slavery, servitude, human trafficking, unlawful child labour and forced labour.
- 1.2 The Lamprell Group has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, and with integrity and transparency in all business dealings; and putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.
- 1.3 This policy statement is made pursuant to the UK's Modern Slavery Act 2015 (the Act) and sets out the steps that we, the Lamprell Group, have taken and will be taking to ensure that slavery and human trafficking is not taking place in any part of our business or our supply chain. It applies directly to all directors, officers and employees of both Lamprell Limited (the Company) and its various subsidiary or affiliated companies (the Group) and those whom the Company appoints to act on its behalf. The Company understands the risks around modern slavery and fully supports the Act and this statement for the 2023 financial year sets out how we communicate and implement the principles of that support.
- 1.4 The Group is a leading provider of diversified fabrication, engineering and

contracting services to the onshore and offshore renewable energy and oil & gas industries. Our workforce levels can vary depending on the number of active projects but, as at 31 December 2023, there were around 5,000 people working for the Group. The vast majority of our business activities and our workforce are located in the United Arab Emirates and the Kingdom of Saudi Arabia.

- 1.5 Our Business Code of Conduct (the Code) is a governing document that outlines our commitment to uphold ethical business practices and to meet or exceed applicable legal requirements. It applies to all of our employees, directors, officers, contractors and suppliers and those whom the Company appoints to act on its behalf, and is applicable wherever in the world we are operating and whatever we are working on. For all our goods and services, we engage our suppliers through relevant contractual arrangements, applicable regulatory frameworks, our core values and the Code.
- 1.6 Lamprell has five core values – Safety, Integrity, Fiscal Responsibility, Accountability and Teamwork; they define our culture, what it means to work for Lamprell and are a consideration in our everyday decisions and actions. Management communicates the importance of the core values to the wider workforce on a regular basis. At all times, employees are expected to demonstrate behaviours consistent with our values.

- 1.7 Creating and developing the right culture is another important aspect to our business model. Our purpose, values and resulting culture are interdependent and we are proud of the culture that exists at Lamprell. Our values define our behaviours and frame the everyday business decisions based on a culture of honesty, curiosity and high performance. We are driven by open communication; we ask our workforce to be enquiring and to challenge the way things are done. Above all, we aim to deliver safe, high-quality products and services – the stronger our performance, the more we can accomplish, so we want our employees to excel and we want to recognise their achievements.
- 1.8 We will not tolerate any slavery or human trafficking within our business operations, and we take a risk-based approach to manpower supply, procurement and subcontract activities through our human resource and supply chain departments. We have in place systems to identify and assess potential risk areas in our supply chain and to mitigate any identified areas of risk. Our employees, suppliers and contractors are also encouraged to report any concerns that slavery or human trafficking may be, or is, taking place. An area of focus for us is on the management of our agency partners to ensure full compliance with the principles and intent of this statement. Our procurement activities are aligned to the Company's values and to the laws of the countries in which we operate. We are committed to acting ethically and with integrity

in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place in our supply chain.

- 1.9 This statement takes into account, and supports, the Group's policies, procedures and requirements as documented in the Lamprell HSES Management System (HSES MS), which is compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and the global safety management system standard ISO 45001:2018. Together with the Code, implementation and operation of our HSES MS underpin our commitment to this statement and management will ensure that this is understood and communicated to employees at all levels within the Group, as well as being regularly reviewed by the Directors to ensure its continuing suitability and relevance to the Company's activities at the highest levels.

### 2. How we deliver our Policy Statement aims

- 2.1 We will deliver on these aims by identifying and mitigating the risk of modern slavery and human trafficking in the following ways, among others:
- Zero tolerance towards slavery and human trafficking by the Group and in our supply chain;
  - Effective and fit-for-purpose due diligence and testing of our contractors, agencies and suppliers,

- in terms of policies, practices and contracts as well as the execution of the Lamprell Supplier Code of Conduct & Declaration;
- c. Flow-down of contractual obligations to ensure that all those participating in our supply chain will comply with our values and zero tolerance policy ([see item a above](#)) in this regard as well as seeking to work with customers that share our values on ways to share/learn from each other on best practices;
- d. Regular auditing & review of practices to confirm that employees within the Group and contracting staff in the supply chain are paid a wage and benefits in compliance with the national legal standards as a minimum, and preferably at higher levels (and are paid with any applicable wage protection system);
- e. Compliance by our suppliers with (i) safe and healthy working facilities and accommodation, and appropriate measures & systems to maintain that; (ii) HSE training for employees; and (iii) all applicable legislation to provide a safe and healthy workplace;
- f. Meetings between the Board Audit and Risk Committee with members of the Company's Human Resources team responsible for employee welfare during the year (either in person or remotely), to ensure that the Board receives direct feedback from the yard workforce around issues of concern;
- g. Use of a whistleblowing policy to encourage the reporting of concerns and to protect whistleblowers;
- everyone working on Lamprell projects (including suppliers and contractors) is actively encouraged to report their concerns through their line manager, or a member of the management team, or through the FaceUp third-party whistleblowing portal.
- 2.2 To ensure a high level of understanding, we make training on the risks of modern slavery and human trafficking in our supply chains and our business available to relevant members of staff. All Directors have been briefed on the subject.
- 3. Measuring performance against our Policy Statement**
- 3.1 We will use the following performance indicators to measure how we ensure that slavery and human trafficking will not take place and are not taking place in any part of our business:
- a. Completion of audits by Supply Chain Management Dept., Internal Audit and/or the HSES Dept.;
- b. Training workshops and annual update communications to create continued awareness on modern slavery issues and particularly such that our employees understand how they are protected in relation to human rights and labour standards legislation;
- c. Use of labour monitoring and payroll systems to keep the Board apprised of market development and align accordingly the Company as approved by the Board; and
- d. Robust communication with key contacts at our suppliers to confirm their understanding of, and compliance with, our expectations around this Policy Statement. This is underpinned by our supply chain being required to complete a human rights and labour standards questionnaire to provide further assurance.
- 3.2 For transparency, the Company will publish this statement on its website for all stakeholders including employees, clients, suppliers and/or investors to inspect.
- 3.3 Staff are expected and encouraged to report concerns to management, who they are expected to investigate and, as appropriate, act upon the findings. Failure to comply with this statement may result in internal disciplinary action up to and including termination and could even mean that a civil and/or criminal offense has been committed.





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