

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT



This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (“MODSA”) and sets out the steps that Denholm Oilfield Services Limited and its subsidiaries (together Denholm Oilfield Services) have taken to ensure that slavery and human trafficking is not taking place in any part of their businesses or in their supply chains.

DENHOLM OILFIELD SERVICES

Denholm Oilfield Services prides itself on running its businesses to the highest standards of ethical conduct. It strives to be a good corporate citizen and is committed at all times to doing business in a responsible way ensuring that we have a positive impact on our stakeholders, our environment and the wider communities. It is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its businesses and will not deal with or support any business knowingly involved in slavery or human trafficking.

CODE OF CONDUCT

At the heart of the business is our code of conduct which reflects our commitment to acting ethically and with integrity in all our business relationships. The code of conduct defines who we are, how we behave and what we stand for and it is built around our six core values:

- Safety
- People
- Integrity
- Excellence
- Relationships
- Responsibility

Denholm Oilfield Services will not tolerate the use of child labour, human trafficking or any kind of forced compulsory labour. We are committed to treating our employees equally and with respect and strive to provide a fulfilling workplace where our workers can flourish, free from any kind of discriminatory behaviour, harassment or victimisation.

We recognize our responsibility and we have defined in the code of conduct, the expectation on our agents or third parties, which states we only use them if they are known to act to standards consistent with our code of conduct and we will always follow an approved process before we engage with them.

All-encompassing in the code of conduct is our commitment to behaving responsibly in all our business dealings, whilst ensuring it complies with all applicable laws and regulations, including MODSA.

RELEVANT POLICIES

During 2018, Denholm Oilfield Services conducted an exercise to update their policies and procedures which included updated policies on Anti-bribery and Corruption, Whistleblowing, Employee code of conduct, Code of Conduct and Supplier Vetting Guidance. Included in the new policies was the introduction of a new compliance reporting line through a newly identified compliance officer and team.

TRAINING

Senior managers from across our businesses took part in external training to improve their knowledge and understanding of Anti-Bribery and Corruption. An element of the training was in relation to the Supplier Vetting to ensure we are only doing business with people who conduct their business ethically and within the laws and regulations, including MODSA. Ongoing training will be given to existing senior managers and all new senior managers when they join the Group.

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT



RISK ASSESSMENTS

Denholm Oilfield Services conducted a high level risk assessment to identify whether (and if so, where) risks of modern slavery arise within our businesses and supply chains. We improved our practices for conducting supplier due diligence in the form of the new Supplier Vetting Guidance Policy and Supplier declarations.

WHAT WE WILL BE DOING IN 2019

We will reinforce the importance of our values and how we do business through a review of the Employee Code of Conduct and ensuring all employees complete a declaration to demonstrate their commitment to conducting themselves responsibly in all their business dealings.

BOARD APPROVAL

The board of directors of Denholm Oilfield Services Limited approved this statement at its meeting of 17th December 2018 and this is our statement for the financial year ended 31st December 2018.

Signed for and on behalf of Denholm Oilfield Services Limited



John S Denholm
Executive Chairman