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# MODERN SLAVERY STATEMENT 2022

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**NES Fircroft Limited is a global workforce specialist offering a full range of staffing solutions to our customers across 45+ locations. Our services are complemented by an industry leading support service and global mobility package, delivering optimum solutions to customers in a variety of sectors.**

Core services offer Contract, Permanent (Direct) Hire, Managed Solutions or a full outsourced services spanning the Oil & Gas, Power & Renewables, Infrastructure, Life Sciences, Mining, Automotive and Chemicals sectors worldwide.

Our services are complemented by an industry leading support service and global mobility

package to ensure our clients keep hold of the top talent in a compliant manner for as long as they need it.

Our vision is to provide the expertise which supports our clients as they accelerate the transition to sustainable energy production and secure a brighter future for generations to come.

Read more about NES Fircroft services at [www.nesfircroft.com](http://www.nesfircroft.com)

## REPORTING REQUIREMENTS//

Pursuant to Section 54(1) of the UK's Modern Slavery Act 2015 and Section 16 of the Australian Modern Slavery Act 2018 (collectively "the Legislation"), this statement constitutes NES Fircroft's modern slavery and human trafficking statement and outlines NES Fircroft's approach to tackling modern slavery. This statement is made by NES Fircroft Limited and covers the businesses global operations. Specifically, this statement reflects each of its business entities set out in Appendix 1 who have reporting responsibilities under the Legislation.

## OUR APPROACH & COMMITMENT//

Personal integrity and responsibility are the foundation of our business; we differentiate our solutions on the basis of compliance, integrity, and responsibility, and in accordance with local and international laws. Within this context, NES Fircroft does not tolerate practices involving slavery, servitude, forced or compulsory labour, or human trafficking. We are committed to these principles and to taking all reasonable steps to ensure slavery and human trafficking are not taking place within our business, that of our partners or the ensuing supply chain.

## GOVERNANCE & COMPLIANCE//

Commitment and compliance to the elimination of modern slavery practices is incorporated within the NES Fircroft 'Governance & Compliance' framework; defined by our core business values and supported by a series of corporate policies and awareness modules based on legal, ethical and industry standards, and NES Fircroft expectations.

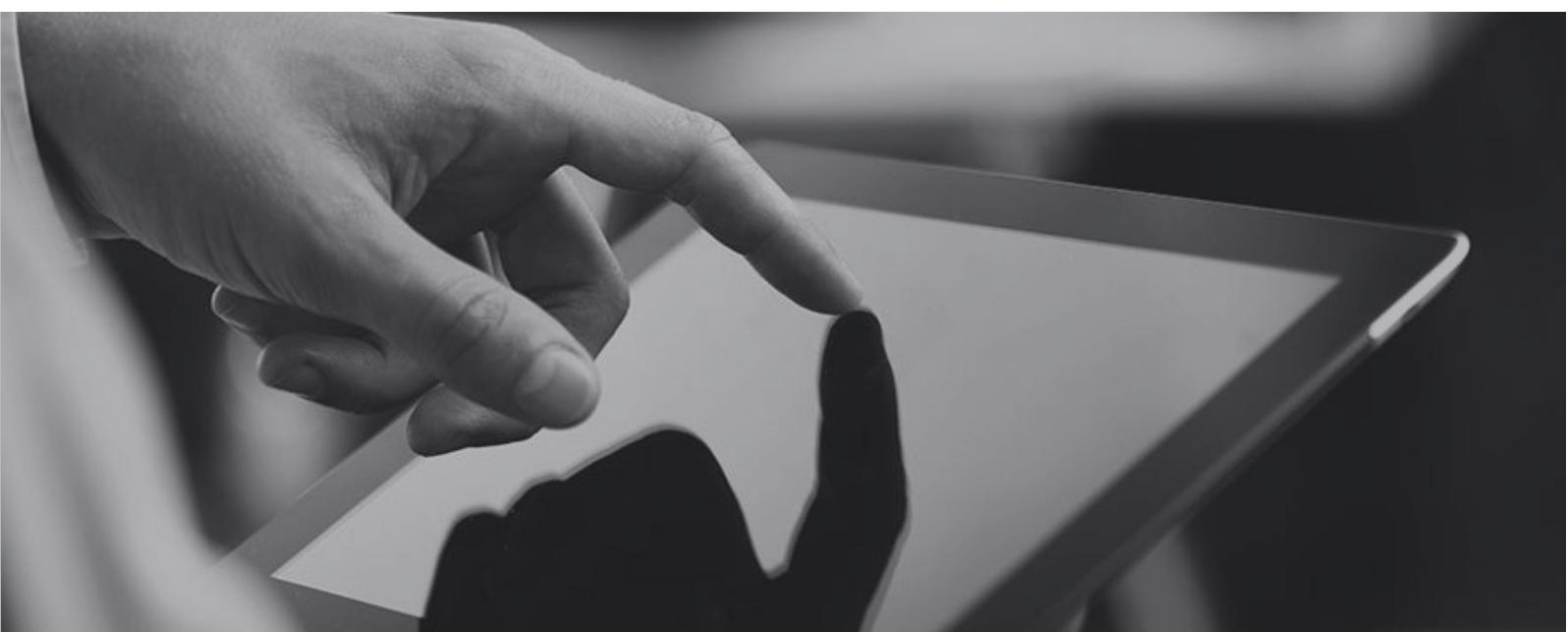
**Our Core Business Values, bind our employees together and drive our business ethos and passions.**

Our **ESG** program aligns strategies and operations with the UN Ten Principles on human rights, labour, environment and anti-corruption.

Our **Business Ethics** and **Human Rights policies** set out the high ethical standards expected across our global operations, ensure basic human rights principles are afforded to individuals and outline the principles that guide our business practices.

Our policy and practices are communicated and understood by NES Fircroft employees and, in line with the relationship, companies with which NES Fircroft do business with. Business operations are governed by our ISO9001 certification applying an ethos of governance, compliance and improvement.

**Policy clearly states that NES Fircroft will not tolerate practices that do not meet our ethical standards.**



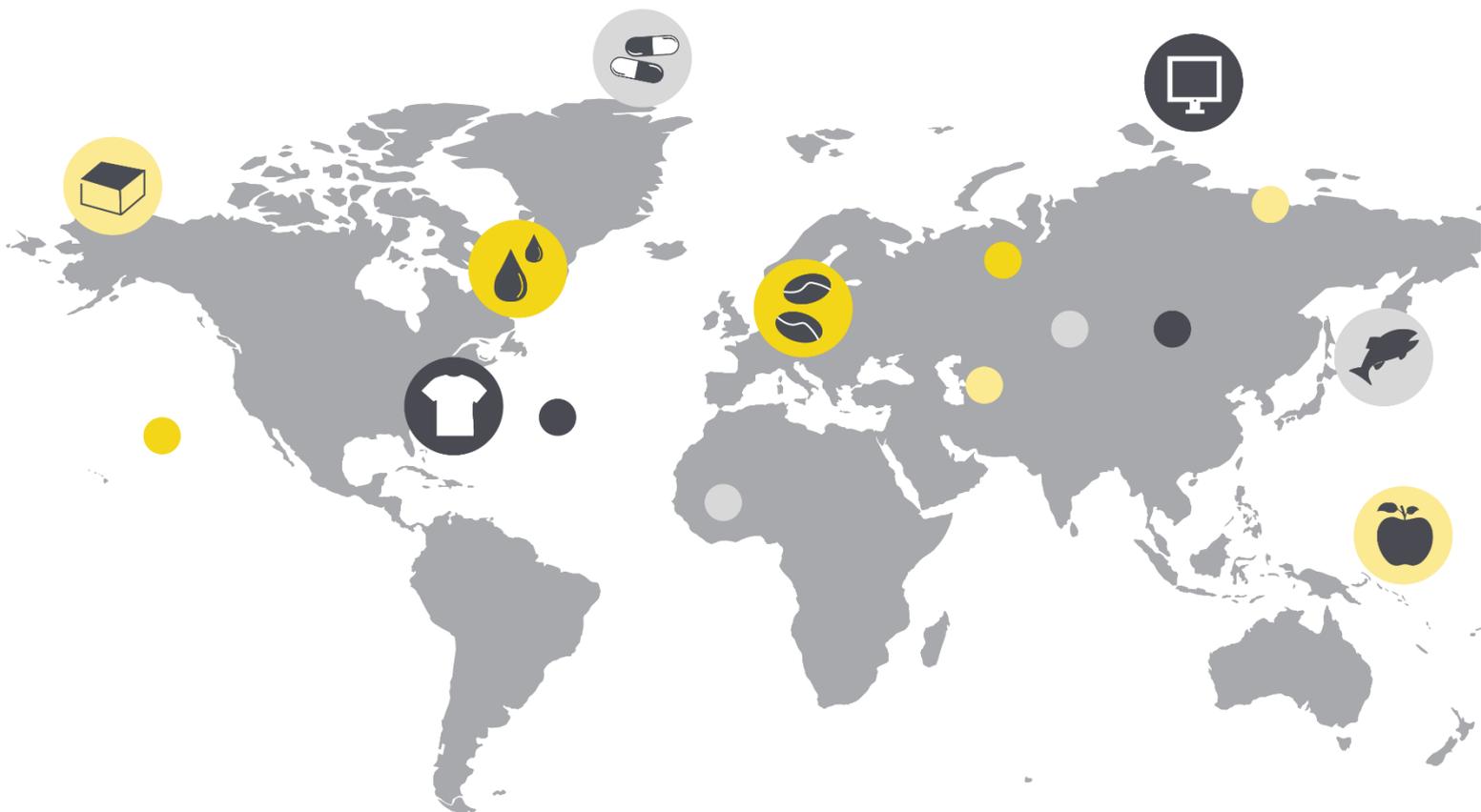
## OUR SUPPLY CHAIN//

NES Fircroft recognises that some of the sectors or jurisdictions in which our clients operate may be more susceptible to modern slavery and human rights abuses than others, but we are fully committed to ensuring the highest standards, irrespective of sector or location. We have a zero-tolerance approach to modern slavery and human trafficking within our supply chain. In the UK, Australia and the rest of the world, the majority of our supply chain incorporates business partners and professional consultancy services, namely financial or legal specialists, or organisations that partner with NES Fircroft. A proportion of our supply chain is also linked to commodities, such as utilities, workplace equipment and welfare provisions. We consider the risks of forced labour and human trafficking to be relatively low in our supply chain but take proportionate steps to mitigate that risk.

New suppliers of goods or services are evaluated and approved by dedicated Compliance Officers. Our global supplier evaluation process assesses the types of suppliers we use and tailor questionnaires according to risk tiers. The process incorporates a detailed **Code of Conduct for Business Partners & Suppliers.**

Along with communicating NES Fircroft’s values and expectations, the code of conduct obligates suppliers to declare their commitment to the same ethical standards, laws and regulations. It also includes expectations pertaining to the proper handling of intellectual property, personal data, QHSE concerns, and Human Rights including Modern Slavery, within the supplier’s own business and throughout their supply chain.

Ongoing due-diligence takes place using a World-Check® organisation using risk intelligence data.



## MODERN SLAVERY RISKS//

We continue to believe that our exposure to the risks of modern slavery is low within our own business and supply chain. We do however recognise that, as a global business, there could be higher risk in some of the jurisdictions we operate in or indirect exposure through our supply chain. Using resources taken from the [Global Slavery Index](#), we have considered where potential risk is higher and ensure that the management controls applied to mitigate these risks are compliant across our global business.

**When considering potential risks that may contribute or link to modern slavery practices, NES Fircroft has identified the following areas and effective methods to mitigate these risks.**



### **COMPLIANCE WITH LABOUR LAWS, REGISTRATIONS AND REGULATIONS//**

We document the necessary licences, registrations, business laws and associated methods we use to place individuals into each country in which we operate. This is communicated across the business to ensure placements are being made compliantly and allowing our operations teams the confidently offer customers the right solutions in each location.



### **SUPPLIERS AND THEIR SUPPLY CHAINS//**

We understand there are modern slavery activities across the world and understand the significance or the potential risks associated with our operations. To mitigate these risks, NES Fircroft continues to seek suppliers and business partners that offer a lower inherent risk of modern slavery. By enforcing our supplier due diligence practices globally, ensuring suppliers declare their own actions pertaining to modern slavery and human rights, we continue to fight against any form of modern slavery practices, protecting our people and those in our supply chain.



### **OUR PEOPLE//**

We recognise that vulnerable populations are one of the key factors which elevate the risk of modern slavery. At NES Fircroft we make certain that employees are free to choose to work for us and placed candidates are free to work with the clients we enter into business with. Our practises comply with local legislation and encompass clear contracts for employment or assignment services respectively, defined notice periods, strict on-boarding guidelines, and business conduct provisions to ensure people are treated in a fair and equal manner, with dignity and respect.



### **REPORTING MECHANISMS//**

The ability to report incidents or suspected instances of wrongdoings, including unethical practices and instances of human rights abuses is an important factor to NES Fircroft. Like all organisations, we face the risk of things going wrong from time to time or may unknowingly harbour illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them should they occur. Our Whistleblowing Policy allows for disclosure of information in an open, or confidential manner. Individuals can raise their concerns to specific key contacts or raise them anonymously through our [Whistleblowing Portal](#).

## ACTIONS TO ADDRESS THE RISKS OF MODERN SLAVERY PRACTICES//

Our recruitment processes underpin expectations from employees, suppliers and customers, and act to ensure transparency in our recruitment operations for an assurance that individuals are not being placed into any situation that may be construed as Modern Slavery.

**OPERATIONAL CONTROLS** in place aim to address risks associated with modern slavery activity and human rights abuses, include the following governance controls, all applied across our global business with the objective of achieving compliant services that protect our business and our people:

- Assignment placements being subject to regular robust compliance audits deriving from legal, industry and contractual obligations. Reported to the Operations Committee, compliance audits are conducted by our Compliance Officers who are independent of the placement process and act as an additional assurance that we are meeting our own expected conduct standards.
- Recruitment protocol and expected business conduct obligations being communicated throughout global operations and governed by the principles of ISO9001.
- Establishing robust, global operational processes which embed criteria such as:
  - Job descriptions for vacancies, specifically detailing the work to be undertaken, location of work and remuneration packages;
  - Approved templates for CV, Contracts, Terms and candidate on-boarding to ensure a consistent, diverse approach is delivered at all times, free from risk of discrimination and human rights abuses; and
  - Contracts for services being in place for each placement, specific to the individual's needs and as agreed during the recruitment stages.
- Terms of Business with clients agreed in all instances, fully by competent Legal personnel to mitigate the risks and exposure to relevant stakeholders.
- Supplier evaluation procedures incorporate specific declarations of compliance to NES Fircroft's 'Code of Conduct' that addresses expectations, compliance obligations, and follows a management approval process.
- Candidate and Employee engagement protocol managed by experienced, dedicated personnel who apply:
  - Strict compliance checks for all candidates placed on assignment;
  - Employment contracts and contracts for services to individuals complete with transparent information on the work, organisation and associated payments;
  - Induction programmes defining our expectations of, and commitment to employees.
- Diversity & Inclusion commitments linked to our ESG program clearly defining acceptable behaviour and working towards the assurance that individuals are treated in a fair and equal manner and with dignity and respect.
- Governance resource encompassing Risk, Compliance, Audit and Legal functions focused on establishing compliance obligations, including those defined by the Modern Slavery and Human Rights, incorporating these obligations into operational activity, and monitoring intended results.

**MONITORING** is undertaken in line with the control measures identified as key areas to mitigate perceived risks or indicators of modern slavery practices and groups. Our services are supported by our Integrated Management System and the principles of ISO9001 to provide assurances of consistency, compliance and intended results, with objectives set at different levels across the business. Our business policies, objectives and associated documentation are subject to regular review and audit.

**TRAINING & AWARENESS** for employees is delivered through NES Fircroft's Learning Management System. Core mandatory training encompasses the expected business conduct standards and specifically requires all new employees to undertake a Business Ethics module that covers Human Rights and Modern Slavery. The training is applied across our global business and is subject to review, acknowledgement, and acceptance. Where appropriate supplementary modules are rolled out across the business in order to upskill our current internal employees or offer further support where required.

Combined with NES Fircroft's central incident reporting area, global employees are provided with awareness on indicators, prevention, and reporting lines associated with our Expected Business Conduct framework.

**REPORTING** incidents, concerns or suspicions can be undertaken in several ways, either directly to key contacts, through our incident management procedure or through the NES Fircroft **Whistleblowing Portal**. NES Fircroft will assess any actual or suspected concern in connection with human rights and modern slavery and determine specific remedial actions. Key contacts are appointed comprising of HR, Legal, Risk & Compliance and senior leaders. Wherever applicable, NES Fircroft will report concerns or non-compliance with the legislation to its clients.



## EFFECTIVENESS OF ACTIONS TAKEN//

NES Fircroft has not identified any instance of modern slavery during the year across our supply chain, nor are we currently aware of any realised material issues relating to modern slavery risks or practices impacting an engaged supplier, employee, or customer.

We acknowledge that reviewing, analysing, addressing, and preventing modern slavery risks in our operations and supply chains are ongoing activities. It is important we continue to regularly review our operational controls and undertake due diligence before onboarding any new suppliers.

## CONTINUAL IMPROVEMENT//

We continue to assess risks across the geographical areas in which we operate and raise awareness through internal module training or due-diligence practices ensuring that new members to the NES Fircroft team, either direct staff or external providers, understand our core values and expectations.

**In the past 12 months, NES Fircroft has progressed in our efforts to tackle modern slavery and forced labour practices by:**

- Enhancing service provider due-diligence and review practices;
- Expanding client and vendor screening using World-Check® Risk Intelligence; and
- Investing in resources focused on risk, compliance and governance.

## CONSULTATION & APPROVAL//

NES Fircroft consults with the relevant operating companies on an ongoing basis to assess any specific risks presented and ensure they all understand and follow the procedures and controls in place.

**This Statement is prepared following consultation with the corporate functions across our global business and is made in accordance with the Legislation, constituting the Company's slavery and human trafficking statement for the financial year ending 31<sup>st</sup> October 2022.**

**Content has been approved on behalf of the NES Fircroft Board of Directors and is signed on behalf of the business by the Director of Risk.**

**Ian Campbell**  
**Director of Risk**  
**March 2023**

# APPENDIX 01//

Business entities formally covered by this statement.

BUSINESS ENTITY	REGISTRATION	COUNTRY OF REGISTRATION
NES Fircroft Australia PTY Ltd	CAN 100 091 245	Australia
Fircroft Engineering Services Limited	01405855	England and Wales
NES Advantage Solutions Limited	5309561	England and Wales
NES Global Limited	2690805	England and Wales
NES Global Pty Limited	14 130 240 452	Australia
NES UK Limited	01443574	England and Wales