

Statement of Board of Directors of Acteon Group Limited in accordance with section 54 Modern Slavery Act 2015 for the financial year ending 31 December 2020

Acteon Group Limited (“Acteon/we”) will not support or deal with any business knowingly involved in slavery or human trafficking. This statement sets out the steps taken to ensure slavery and human trafficking is not present in our supply chains or any part of our business.

Structure of our business and supply chains

Acteon is the non-operational parent company of several UK and non-UK entities (the “Group”) operating as part of the supply chain for the provision of goods, services, and labour to the renewable, nearshore construction and oil and gas sectors. Acteon delivers support for physical infrastructure tasks (e.g. provision of specialist equipment, including pile hammers and subsea drills) and insights (e.g. interpretation and utilisation of data) through the following segments¹:

 ACTEON	 PULSE <small>Structural Monitoring</small>	 claxton
INTEGRATED SOLUTIONS	ASSET INTEGRITY AND MONITORING	DRILLING AND DECOMMISSIONING
 seatronics	 TEAM <small>Energy Resources</small>	 M <small>MENCK</small>
ELECTRONICS AND TOOLING	ENERGY RESOURCING	FOUNDATIONS AND CABLES
 UTEC	 INTERMOOR	 2H <small>offshore</small>
GEO-SERVICES	MOORINGS AND ANCHORS	OFFSHORE ENGINEERING

Our customers include global operators, developers, and contractors. We utilise suppliers to assist in offering these capabilities to customers. We are also supported by business partners (which include agents, distributors, and joint venture partners) across the world, particularly in emerging markets.

Policies on modern slavery

We understand the importance of applying systems and controls to ensure slavery and human trafficking are not part of our supply chains or our own business. Our approach and commitment are communicated across the Group via our Anti-Slavery Policy which was adopted in 2017 and recently updated. The Anti-Slavery Policy also forms part of Acteon’s Compliance Handbook which is accessible to all staff via Acteon’s Human Resources portal. Staff are required to confirm annually, via the portal, that they have read and understood the contents of the handbook.

Acteon upholds a policy of non-retaliation or victimisation against anyone who reports concerns about slavery and human trafficking. Staff can report these concerns in various ways including to line managers, compliance advocates within their respective segments, Acteon’s compliance team, or via Acteon’s third-party operated compliance helpline and confidential web reporting system.

Business partners are also made aware of our slavery and human trafficking commitments and are asked to provide contractual assurances that they too will uphold the same standards.

¹Asset and Integrity Monitoring includes Pulse Structural Monitoring and Deepwater. Drilling and Decommissioning includes Claxton Engineering Services, InterAct PMTI and Probe Oil Tools. Electronics and Tooling includes Seatronics and J2 Subsea. Energy Resourcing includes TEAM Energy and Resources. Foundations and Cables includes MENCK, Aquatic Engineering and Construction, Core Grouting Services, Large Diameter Drilling and LM Handling. Geo-Services includes UTEC, Benthic and TerraSond. Mooring and Anchors includes InterMoor and Bruce Anchor. Offshore Engineering includes 2H Offshore Engineering and Clarus.

Due diligence processes

Following the introduction of the Modern Slavery Act 2015, due diligence processes were updated and improved in the UK to include robust wording in supplier contracts, questions on slavery and human trafficking in supplier questionnaires and letters sent to existing suppliers to ask what steps they were taking in relation to the requirements under the Modern Slavery Act 2015.

Our updated supplier due diligence process is now well established in the UK and designed to ensure we only work with suppliers who uphold the same standards and conduct similar processes to ensure slavery or human trafficking is not part of their own business or supply chains. We ask:

- for confirmation the supplier does not use slavery or forced/compulsory labour;
- what steps the supplier takes to investigate its own supply chain;
- for confirmation the supplier has a policy or statement on slavery and human trafficking; and
- for a copy of their own statement or confirmation they are not required to prepare one.

All business partners go through a strict approval process which includes risk-based due diligence such as screening against a range of risks (e.g. sanctions, adverse media, regulatory action). Slavery and human trafficking obligations also form part of the contractual arrangements.

Auditors of suppliers and business partners are also made aware to look for any signs of slavery or human trafficking and to report any concerns accordingly.

Risk Assessment

Risk is assessed by considering several factors but primarily the scope of work and locality. Tools such as the Global Slavery Index are used to assist in assessing risk level (www.globalsslaveryindex.org).

Acteon acknowledges that the risk of slavery and human trafficking in our core supply chains is low due to the highly skilled nature of a lot of the work and the localities in which that work is sourced. However certain pockets of risk have been identified, for example, procurement in less familiar geographies or for scopes of work including vessels where low skilled manual labour may be utilised.

Measuring effectiveness

We undertook an audit in 2020 asking the following with reference to the financial year 2019:

- Actions taken to minimise the risk of slavery or forced labour;
- Details of documented policies (e.g. Supplier Code of Conduct) seeking to reduce the risk of slavery or forced labour in your supply chain;
- Details of due diligence processes carried out, initiated or (existing processes) amended;
- The status of risk assessments analysing relevant risks in your supply chain, details of the severity of risks identified and how you mitigate or plan to mitigate these risks;
- Any KPIs introduced or to be introduced to measure progress in mitigating risks identified;
- Any staff training carried out or planned; and
- Confirmation you have completed outstanding actions from previous years.

The responses demonstrated a high level of awareness and compliance with Acteon's policies and processes on slavery and human trafficking. It also showed that actions were taken and encouraged outside of those specifically requested by Acteon (such as additional training).

Risk assessments and due diligence processes continued to assess the risk as low in most circumstances.

Training for staff

Induction training is given to all staff on all areas covered by the Acteon Compliance Handbook (including slavery and human trafficking). Within that training, staff are encouraged to report all concerns via one of the reporting routes (and set out above in the policies section of this statement).

Acteon will continue to work with the Group on making improvements. Acteon is also committed to establishing a sustainable ESG strategy which includes a focus on the social impact Acteon has both to individuals within its own business and its supply chains. Measures concerning the prevention of modern slavery and other forms of human exploitation are part of this strategy.

I, Carl Trowell, hereby certify that the information provided in this slavery and human trafficking statement is accurate and has been approved by the board of directors of Acteon Group Limited on 16 June 2021.



Dr Carl Trowell, Group Chief Executive

For and on behalf of Acteon Group Limited

Date: 16 June 2021