

STATEMENT OF ATLANTIC & PENINSULA MARINE SERVICES (APMS) FOR THE APMS GROUP OF COMPANIES (“APMS”) PURSUANT TO THE MODERN SLAVERY ACT 2015 (“THE ACT”)

At APMS we are committed to doing the right thing in the right way. Our policies and procedures aim to ensure that the highest standards of ethics and integrity are maintained. As a major provider of services to the marine and energy sectors, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we are fully committed to combatting slavery and human trafficking.

Organisational Structure and Business

APMS is a specialist in the global marine and energy sectors providing ship repair, ship conversion and marine engineering services.

Our Supply Chain

Our supply chain covers a broad range of goods and services associated with the operation of our business, including: third party direct labour, a wide range of engineering subcontractors, fixed and mobile plant hirers, operators and suppliers and suppliers of operational goods and services.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our anti-slavery and human trafficking policy reflects our commitment 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 is not taking place anywhere in our supply chain.

Supplier Adherence to our Values and Ethics

We have zero tolerance to slavery and human trafficking and expect those in our supply chain and contractors to comply with our values and ethics. To that end we are in the process of putting in place a supply chain compliance programme to consist of certifications, contractual provisions requiring compliance and sanctions for supplier non-compliance.

Due Diligence Process

As part of our initiative to identify and mitigate risk we maintain the following processes / procedures:

Supply Chain

Supplier Selection, Certifications and Contracts

- We have procedures in place to ensure that all future suppliers of goods or services to APMS are required to respond to a pass/fail question on whether their organisation is compliant with the Modern Slavery Act;
- Our agreements which are used for the purchase and supply of goods and services include obligations requiring compliance with all applicable laws, statutes, regulations, codes and policies, including in relation to anti-slavery and anti-human trafficking, and requiring that adequate and compliant policies and procedures are maintained and enforced related to such matters and prohibiting any activities, practices

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or conduct which may constitute or cause any breach of, or offence under, any such laws, statutes, regulations, codes, policies or procedures. They also provide for us to be able to audit compliance in respect of such matters and terminate and cease dealing with any supplier in the event of a breach of any such obligations;

- We are carrying out ongoing assessments of existing supplier relationships who we select based on priority according to perceived risk (taking into account relevant factors such as supplier location and the nature of the supplies, such as the supply of labour) with a view to seeking to impose additional obligations or agreeing contract variations to address the requirements of the Act.

Violations

In accordance with our zero-tolerance policy towards violations of the laws banning forced labour, slavery and human trafficking, we will seek to ensure that all future agreements, which are used for the purchase and supply of goods and services, will allow us to terminate and cease dealing with any supplier in the event of any such violation.

Our own business

Code of Conduct

APMS's Code of Conduct details the standards that all our employees are expected to adhere to in terms of behaviour. The Code sets out our undertaking with regard to human rights and compliance with labour law. It specifically sets out our commitment to not use compulsory or forced labour in our operations and to maintain a framework of fair and just remuneration and working hours.

Whistleblowing Policy

APMS encourages all its workers, customers and business partners to report any concerns related to its direct activities or its supply chain. This includes any circumstances that give rise to an enhanced risk of slavery or human trafficking. APMS's Whistleblowing policy is applicable to employees and is designed to make it easy for employees or officers to make disclosures without fear of retaliation.

Recruitment / Agency Workers Policy

APMS endeavours to use only specified, reputable employment agencies to source labour and verifies the practices of any new agency it is using before accepting workers from that agency. APMS continually reviews its recruitment procedures to ensure that we have in place rigorous identity checks prior to employing individuals and ensure that all employees are in receipt of the minimum wage.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide training for relevant managers within our business.

Violations

Our Disciplinary policy permits the termination of employment of employees found to be involved in any breach of the law including the law banning forced labour, slavery and human trafficking.

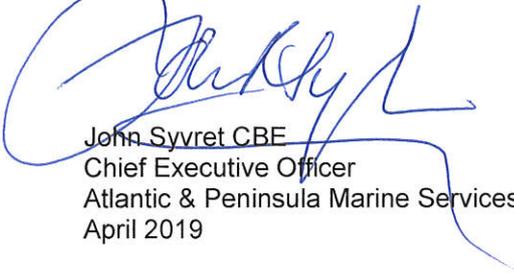
Our effectiveness in combatting Slavery and Human Trafficking

We will keep under review, monitor and assess how effective we are to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain and we will take and implement all

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appropriate steps and measures to act on the findings and outcomes of any such reviews and assessments and maximise our effectiveness and continual improvement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes APMS's slavery and human trafficking statement for the financial year ended 31 March 2019. The statement has been approved by our Board of Directors.



John Syvret CBE
Chief Executive Officer
Atlantic & Peninsula Marine Services Limited
April 2019