

CAN Group Modern Slavery and Human Trafficking Statement

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the CAN Group's slavery and human trafficking statement for the Financial Year: 1st January – 31st December 2019.

Organisational Structure

CAN Group are a provider of Integrity Management, Inspection, Trades and QA/QC services in the Oil & Gas sector.

CAN Group consists of CAN (Holdings) Limited, the parent company of CAN (Offshore) Limited, who trades as CAN, ENGTEQ and VENTEQ. We operate out of our headquarters in Aberdeen, UK where operations span UK, Europe, America and Africa.

Our Supply Chains

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedures includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards.

We haven't been made aware of any allegations of human trafficking/slavery activities against any of our suppliers, but if we were we would act immediately against the supplier and report it to the authorities.

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.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have put in place this designated Modern Slavery and Human Trafficking Policy for identifying and preventing slavery and human trafficking in our operations:

- Whistleblowing Policy: We encourage all employees, customers and suppliers to report any suspicion of human trafficking to Senior Management without fear of retaliation.
- Code of Conduct: We encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our supply chain.
- Purchasing Code: We are updating our Purchasing procedure, terms and conditions and supplier contracts to make explicit reference to slavery and human trafficking

This Modern Slavery and Human Trafficking Policy demonstrate 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 chains.

Due Diligence for Slavery and Human Trafficking

CAN Group is putting in place an initiative to conduct due diligence on all new suppliers during on-boarding and on existing suppliers/third parties at regular intervals. This will include:

- Reviewing suppliers/third parties and their health and safety standards, labour relations and employee contracts
- Requiring improvements to substandard employment practices

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Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. We require our suppliers to attest that:

- They don't use any form of forced, compulsory or slave labour
- Their personnel work voluntarily and are entitled to leave work
- They provide each employee with an employment contract that contains a reasonable notice period for terminating their employment
- They don't require employees to post a deposit/bond and don't withhold their salaries
- They don't require employees to surrender their passports or work permits as a condition of employment

Awareness

We intend to raise awareness of this issue by sending an email that is focussed specifically on modern slavery to all our personnel rolling out this statement and explaining:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business, we intend to provide training to our personnel. CAN Group will produce and roll-out a bespoke e-learning course to all office personnel which covers:

- Various forms of modern slavery in which people can be held and exploited
- The size of the problem and the risks to our organisation
- How personnel can identify the signs of slavery and human trafficking, including unrealistically low prices
- How personnel should respond if they suspect slavery or human trafficking
- How personnel can escalate potential slavery or human trafficking issues to the relevant people within our organisation
- What external help is available for the victims of slavery
- What steps CAN Group will take if a supplier fails to implement anti-slavery policies or controls
- An attestation from personnel that they will abide by CAN Group's anti-slavery policy

Our Effectiveness in Combating Slavery and Human Trafficking

CAN Group has defined a set of indicators and controls to combat modern slavery and human trafficking in our organisation and supply chain. These include:

- How many employees have completed mandatory training
- How many suppliers have filled out our ethics questionnaire
- How many suppliers have had improvements placed on them by the CAN Group
- How many reports have been made by our employees that indicate their awareness of and sensitivity to ethical issues

Signed for and on behalf of CAN.



Innes Walker
Commercial Director



Adam Byrne
Operations Director

January 2019