

# 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. We are fully committed to promoting transparency and collaboration to eliminate the risks of modern slavery by strengthening our knowledge and raising awareness throughout the group and our suppliers.

## 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.

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## RELEVANT POLICIES

Denholm Oilfield Services is committed to continuously reviewing and updating our policies and procedures when necessary to ensure they are up to date and relevant and their importance is at the forefront of our minds.

During 2019, we have continued to review our policies and procedures which includes Anti-bribery and Corruption, Whistleblowing, Employee code of conduct, Code of Conduct and Supplier Vetting Guidance.

## TRAINING

Our Code of Conduct is reinforced on an annual basis to our employees to ensure our workforce strive to protect and enhance the dignity of our people and anyone who has dealings with our business. All employees have signed a declaration to demonstrate their commitment to conducting themselves responsibly in all their business dealings.

Upon commencement of employment new staff are taken through the company policies and the Code of Conduct and sign a declaration to show their commitment to conducting all their business dealings ethically and within the laws and regulations, including MODSA.

## RISK ASSESMENTS

Denholm Oilfield Services continued to review whether (and if so, where) risks of modern slavery arise within our businesses and supply chains.

An internal audit was conducted during the year, part of which was an audit on ensuring the employee Code of Conduct declarations were up to date.

## WHAT WE WILL BE DOING IN 2020

We will continue to reinforce the importance of our values which underpin our Code of Conduct and how we do business by 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 16<sup>th</sup> December 2019 and this is our statement for the financial year ended 31<sup>st</sup> December 2019.

Signed for and on behalf of Denholm Oilfield Services Limited

John S Denholm  
Executive Chairman