

Modern Slavery Act – Alderley plc statement

The Alderley plc board, and the boards of our subsidiary companies, seek to operate our businesses in an ethical and as environmentally sustainable way as possible.

We recognise and support the requirements of transparency set out in section 54 of the UK Modern Slavery Act and seek to apply it across our global group.

We acknowledge the risk of bonded labour and unacceptable working practices within all countries and of the enhanced risk within certain countries in which we operate. We are further alive to the risk of modern slavery or human trafficking within our core supply chain.

We are committed to ensuring that our employees, in whichever country they are resident, are paid an amount which meets or exceeds the applicable minimum wage. We further ensure that they enjoy the employment protections of the relevant country, and in many cases, provide benefits in excess of local minimum standards.

All of our employees are required to undertake training on the issues raised by the Modern Slavery Act which includes guidance as to how to identify issues that may be evidence of human trafficking or modern slavery and what action to take. In addition, all employees, directors, agents, contractors and suppliers with any member of the Alderley Group will be required to adhere to our Code of Business and Supplier Code (as appropriate).

We acknowledge that further work is always required. To this end, Alderley has formed a Code of Business Group with terms of reference to uphold and improve all areas of governance and compliance across the Alderley Group.

The entire Alderley Group is committed to continuous improvement in this area, both internally and within our relationships with core suppliers. We further recognise the need to improve contracting processes so that the requirement to take positive action against the issues raised by Modern Slavery are highlighted and the risk of any breach is reduced.



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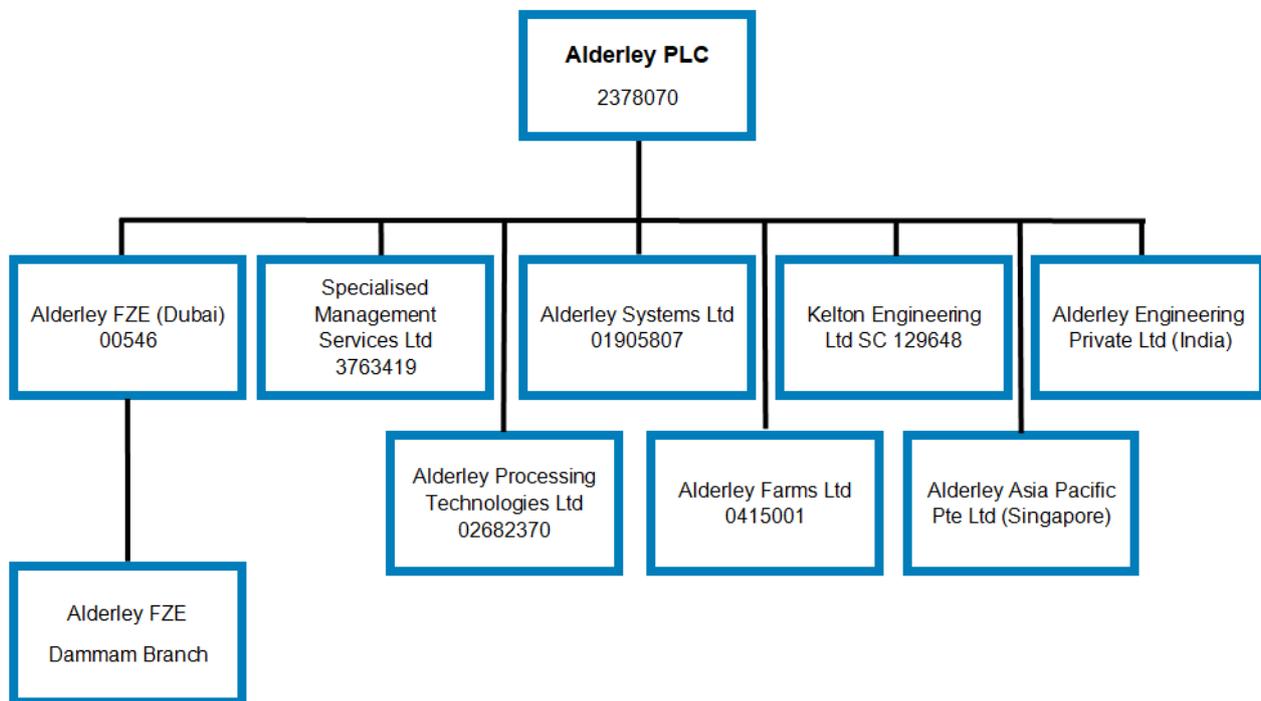
This document sets out the steps the Alderley Group have taken to detect and or prevent human trafficking and modern slavery within its core supply chain. This covers the 12-month period ending on 30 September 2021.

1 The Alderley Group – overview

Alderley is a family owned, British-based engineering company, providing advanced digital, mechanical, process and service solutions for the global energy industry. Alderley has a long heritage in the industry and has supplied solutions to more than 50 countries.

The Alderley Group is made up of a number of trading subsidiaries with Alderley plc as the UK parent.

The trading group of Alderley is as follows:



2 The Alderley Approach

We have undertaken additional work in the last twelve months to work towards the elimination of the risk of modern slavery and human trafficking in our core supply chain. The Alderley Code of Business has been fully rolled out and is adhered to by all employees, directors, workers and contractors. Alderley is rolling out a Supplier Code which is incorporated within the standard terms of purchase of the Alderley Group. This flows down the obligation to meet or exceed Alderley’s approach to elimination this risk with their own respective supply chains.

Alderley ensures that its employees in non-UK countries, wherever possible, exceed local minimum wages and enjoy enhanced employee protections and benefits. Alderley seeks to promote and develop employees based on merit and ability and supports diversity and equal opportunity for all.

The oil and gas industry requires the very highest standards of health and safety compliance. Alderley ensures that robust health and safety procedures are in place at all times, both at a project level and within the working environment to ensure the safety and wellbeing of employees and workers.

3 Assessing risk areas

Local hired labour

The Alderley Group requires agencies who provide local hired labour to adhere to the regulations addressed in the Modern Slavery Act 2015.

Different cultures and local laws

The Alderley Group recognises the different local customs and cultures of the countries in which we carry on business. We recognise the challenges this can bring and seek to navigate them with sensitivity, whilst always requiring that all employees and workers are treated with respect and dignity.

Training

All employees are required to complete training on the issues covered by the Modern Slavery Act. This training forms part of the induction process and is repeated by appropriate employees regularly via an online provider.

As part of the training and the Alderley Code of Business, employees are made aware of how to report concerns relating to any aspect of human slavery. This includes use of the Group's Whistleblowing process to support the requirement of continuous transparency.