

INTRODUCTION

Survitec Group have taken steps to combat slavery and human trafficking and are committed to continuously improving our practices going forward. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and improving effective systems, controls and practices to ensure modern slavery is not taking place in our supply chains.

We are also committed to ensuring there is transparency in our own business. We believe all employees and workers should be treated fairly, honestly and with respect in relation to basic human rights and we expect the same standards from all our contractors, suppliers, third parties and other business partners.

ORGANISATION'S STRUCTURE

Survitec is a global leader in survival and safety solutions to the marine, defence, aviation and offshore markets. Survitec has over 3,000 employees worldwide covering 8 manufacturing facilities, 15 offshore support centres and over 70 owned service stations. It is further supported by a network of over 400 3rd party service stations and distributors.

OUR BUSINESS

Survitec Group comprises the parent company, Survitec Group Limited, along with numerous subsidiary companies operating worldwide. Survitec Group's head office is in the United Kingdom.

This statement applies to Survitec Group and its subsidiaries as set out above.

OUR SUPPLY CHAINS

Our supply chains include the manufacture, sourcing, procurement and delivery of raw materials, components, finished products and related servicing of life saving equipment for end customers who are principally in the marine, defence, aviation and offshore markets.

OUR POLICIES

We strive to act ethically and with integrity in our business relationships and we expect high standards from our employees as well as our contractors, suppliers, third parties and other business partners. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have in place certain policies that aim to encourage and develop these standards of behaviour.

Responsible Sourcing Policy

Our Responsible Sourcing Policy reflects our commitment to acting ethically and with integrity in our business relationships. The policy is provided to certain key suppliers who are requested to sign up to the policy as well as the principles and standards contained therein.

The policy underlines the commitment that business should be conducted lawfully and ethically. It outlines the principles that work should be conducted on a voluntary basis and that workers should be treated with respect and dignity. In particular, the policy makes clear that slavery and human trafficking in any form should not be taking place in supply chains. All Survitec Group directors have been briefed on our Responsible Sourcing Policy and the policy specifically refers to the need for transparency in approaching issues of modern slavery as well as suppliers' disclosure obligations under the Modern Slavery Act 2015.

International Compliance Policy

At Survitec we understand the importance of international compliance across our Group. Our International Compliance Policy sets our compliance protocols and procedures which are designed to help ensure compliance with applicable laws and regulations and to maintain high levels of professional and ethical standards in our business affairs.

The policy applies to all Group employees, contract workers, officers and directors, as well as consultants, representatives, agents, brokers, distributors and other intermediaries when they are acting on behalf of the Group. It covers a number of areas, including anti-money laundering, anti-bribery and trade sanctions. The policy has also recently been updated to underline the Group's commitment to complying with all laws and regulations relating to slavery and human trafficking including, but not limited to, the Modern Slavery Act 2015.

The policy encourages employees to report any actual or potential violations of law, regulations or the policy of which they become aware. There is a Group Ethics Hotline whereby employees can report concerns anonymously and, if employees have any concerns relating to slavery, they can report these concerns via this route.

DUE DILIGENCE PROCEDURES

All our key suppliers must complete an initial supplier questionnaire, which includes questions targeted at slavery and human trafficking risk, to enable us to identify and assess potential risk areas in our supply chains.

KEY PERFORMANCE INDICATORS

We will continue to monitor the following key performance indicators to assess how effective we have been in ensuring slavery and human trafficking is not taking place in any part of our business or supply chain including the following:

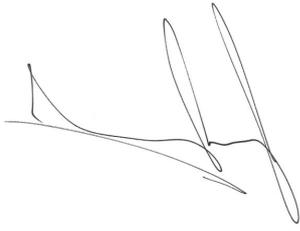
- Reviewing the percentage of our suppliers who have signed up to our Responsible Sourcing Policy with a view to targeting those in higher risk jurisdictions;
- Reviewing the percentage of our suppliers who have completed our Initial Supplier Questionnaire with a view to targeting those in higher risk jurisdictions;
- Seeking to include language with respect to compliance with anti-slavery and human trafficking laws and policies in all new key supplier and all new third-party contracts;
- Seeking to include language with respect to compliance with anti-slavery and human trafficking laws and policies within our standard terms and conditions of sale and purchase; and
- Ensuring that all new employees are trained on our International Compliance Policy and, in particular, slavery and human trafficking, as outlined below.

FUTURE STEPS

We will be delivering refresher training on our International Compliance Policy to all relevant employees in 2019. Our policy has recently been updated to provide further information and training to our employees on slavery and human trafficking including, but not limited to, the Modern Slavery Act 2015 and shall cover:

- Provisions of the Modern Slavery Act 2015
- How to identify the signs of slavery and human trafficking
- What initial steps should be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation
- What external help is available, for example through the Modern Slavery Helpline.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019.

A handwritten signature in black ink, appearing to read 'James Drummond', written over a horizontal line.

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James Drummond

CEO