survitec

INTRODUCTION

We, Survitec Group, are proud of the steps we take to combat slavery and human trafficking and are committed to 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 that for people to excel, they must feel valued and included. We make certain that everyone is treated fairly, honestly and respectfully, and we expect the same standards from all our contractors, suppliers, third parties and other business partners.

OUR BUSINESS

We are a global leader in survival and safety solutions to the marine, defence, aviation and offshore markets. We have over 2,800 employees worldwide, covering 8 manufacturing facilities, 15 offshore support centres and over 70 owned service stations. We are further supported by a network of over 500 third party service stations and distributors.

OUR STRUCTURE

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

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

OUR SUPPLY CHAINS

Our supply chain includes 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. To mitigate against modern slavery risks we audit our Suppliers and ask them to comply with our Responsible Sourcing Policy.

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.

Code of Business Conduct & Ethics

Our Code of Business Conduct & Ethics sets the standard for how we operate our business and how our staff conduct themselves with the highest levels of integrity, honesty, ethical conduct and compliance with the law. It aligns with and reflects our core Values – Safety, Customers, People, Excellence, Innovation and Integrity.

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 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.

Modern Slavery Policy

Our Modern Slavery Policy communicates our zero-tolerance approach to modern slavery and that we are committed to acting ethically and with integrity in all our business dealings and relationships. It outlines our commitment to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our business or supply chain.

The Policy applies to all our employees, contract workers, officers and directors. It also applies to individuals, companies, associations, partnerships, or other entities retained to act on our behalf of or for our benefit, and includes, but is not limited to, consultants, representatives, agents, brokers, lobbyists, distributors, and resellers.

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 Survitec 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

Each supplier who does business with us should sign our Responsible Sourcing Policy which confirms the supplier will uphold certain prescribed standards concerning human rights, labour, health and safety, environmental, and business ethics practices.

We aim to only engage with third parties who uphold our Values and the principles of this Policy. Where we enter into an arrangement with a third party and where such third party does not have its own policy concerning compliance with modern slavery legislation, then we

shall ensure that the third party's adherence to our Modern Slavery Policy is a term of the agreement.

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:

- Due diligence and robust procedures for the onboarding of suppliers and customers;
- 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 aware of our Modern Slavery Policy.

FUTURE STEPS

We aim to deliver refresher training on our Modern Slavery Policy to all relevant employees in 2020. This will include, but will not be 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; and
- 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 2020.

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Ron Krisanda
Executive Chairman