

Modern Slavery Policy

APLC-H-PL07-00

1 Modern Slavery Statement

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

The purpose of this policy is to outline our approach in relation to respecting human rights and to ensure our business has robust processes in place to minimise the risk of modern slavery within our own operations and associated supply chain. We acknowledge the enhanced risk within certain countries in which we operate, and recognise and support the requirements of the UK Modern Slavery Act 2015 and seek to apply it across Alderley. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for our financial year end 30th September 2024.

All of our employees are required to undertake training on the issues raised by the Modern Slavery Act 2015 which includes guidance on how to identify issues that may be evidence of human trafficking, child labour or modern slavery and what action to take. In addition, all employees, directors, agents, contractors and suppliers will be required to adhere to our Code of Business and Supplier Code of Business (as appropriate).

Alderley is committed to continuous improvement, both internally and within our relationships with suppliers. To this end, we have formed the Code of Business Group with terms of reference to uphold and improve all areas of governance and compliance across the business. We further recognise the need to improve the 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 minimised.

This document sets out the steps Alderley has taken to detect and or prevent human trafficking, child labour and modern slavery within its supply chain.

2 The Alderley Structure

Our entities that form Alderley are situated in several countries across the globe, directly hiring over 400 staff, with the additional use of contractors and local hired labour.

Alderley plc is registered in England and Wales, and is the parent company of the following subsidiaries: Alderley Systems Limited, Specialised Management Services Limited, Kelton Engineering Limited, Alderley Farms Limited, Alderley FZCO, Alderley Engineering Private Limited, Alderley Asia Pacific, Alderley LLC, Alderley RHQ and Alderley Industrial Co.

The countries in which we operate are the United Kingdom, the United Arab Emirates, the Kingdom of Saudi Arabia, India, the Republic of Singapore, the State of Qatar, the Kingdom of Bahrain and the Republic of Iraq.

3 The Alderley Approach

We have undertaken additional work towards the elimination of the risk of modern slavery, child labour and human trafficking within our businesses and 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. The Code of Business is reviewed annually with all staff signing the annual declaration that they have read and understood it and will conduct themselves as required by Alderley. We have a Supplier Code of Business which is incorporated within the standard terms of purchase. This flows down to our suppliers the obligation to meet or exceed our intention to eliminate this risk within their own respective supply chains.

Labour

Alderley ensures that its employees, in whichever country they are resident, are paid an amount which meets or exceeds the applicable minimum wage 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. Alderley requires agencies who provide local hired labour to adhere to the regulations addressed in the Modern Slavery Act 2015.

Different cultures and local laws

Alderley recognises the different local customs and cultures of the countries in which we conduct our 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.

Safety and Wellbeing

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. Alderley has developed a Wellbeing Policy dedicated to this topic, which sits alongside our health and safety policies.

Policies

All policies pertaining to governance, including Modern Slavery, the Code of Business, Supplier Code of Business and Whistleblowing, are reviewed and circulated annually by the Governance team.

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 Alderley’s Whistleblowing process to support the requirement of continuous transparency.

Rev	Date	Function	Author	Checked	Approved
03	15/02/2024	Governance	<i>E. Chahal</i>	<i>Tony Mansfield</i> Tony Mansfield (Feb 15, 2024 14:26 GMT)	<i>Philipp Slatter</i>