



South Western
Technologies & Oilfield
Services Ltd.

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1. What is Slavery and Human Trafficking?

Slavery: Exercising powers of ownership over a person

Servitude: The obligation to provide services is imposed using coercion or force

Forced or compulsory labor: Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily

Human trafficking: Arranging or facilitating the travel of another person with a view to their exploitation

1.1 Modern Slavery and Human Trafficking legislation in the main covers four activities.

1.2 This policy covers all four activities.

2. How is it relevant to us?

2.1 Modern slavery is a complex and multi-faceted crime and tackling it requires all of those working for South Western (us, the company, owe) to play a party. At first glance, this whole subject may appear irrelevant to South Western, but it is highly relevant, and we must all be vigilant.

2.2 At a very basic level, preventing the exploitation of people and human trafficking, and protecting our workforce and reputation makes good business sense.

2.3 Modern Slavery legislation recognizes the important part businesses can and should play in tackling slavery and encourages them to do more.

2.4 With this in mind, we need to pay particularly close attention to:

2.4.1 our supply chain

2.4.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards

2.4.3 cleaning and catering sectors and suppliers

2.4.4 corporate hospitality

3. Responsibilities

3.1 South Western, managers and colleagues all have responsibilities to ensure that our fellow workers are safeguarded, treated fairly and with dignity.

3.2 Everyone must observe this policy and be aware that turning a blind eye to modern slavery and human trafficking is not acceptable and not an option.

3.3 The Company

3.3.1 We will:

a) maintain clear policies and procedures which help to prevent exploitation and human trafficking, both in our organization and in our supply chains, and which protect our workforce and our reputation.

b) be clear about our recruitment policy.

c) conduct checks within our supply chains and vet new partners and subcontractors

d) lead by example by making appropriate checks on all employees, and subcontractors to ensure we know who is working for us and with us;

e) ensure we have in place an open and transparent grievance process for all staff and operate a straightforward reporting procedure to deal with any concerns raised.

f) seek to raise awareness so that our colleagues know what we are doing to promote their welfare and the welfare of individuals working in our industry.

g) make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibility to our employees and our customers seriously

3.4 Managers

3.4.1 Managers will:

a) listen and be approachable to colleagues.

b) respond appropriately if they are told something that might indicate a colleague, or any other person is in an exploitative situation.

c) remain alert to indications of slavery (see Identifying Slavery below).

d) raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do.

e) use their experience and professional judgement to gauge situations and respond appropriately.

3.5 Colleagues

3.5.1 We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

a) keep your eyes and ears open and if you suspect someone (a colleague or someone in our supply chain) is being controlled, coerced, or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery).

b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated.

c) tell us if you think there is more, we can do to prevent people from being exploited.

4. The risks

4.1 The principal areas of risk we face, related to Modern Slavery and Human Trafficking, include:

4.1.1 supply chains.

4.1.2 recruitment through agencies.

4.1.3 general recruitment.

4.1.4 customers engaged in hospitality, cleaning, and catering industries.

4.2 We will manage these risk areas through our procedures set out in this policy.

5. Our procedures

5.1 Anti-Slavery statement

5.1.1 We will make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our customers seriously.

5.1.2 We will publish this statement on our website.

5.1.3 Our historic statements will remain available on our website.

5.1.4 South Western's statement will set out the following matters:

a) South Western position in relation to the global market

b) The sectors within which it is active

c) Details about our supply chains

d) The key risk areas we face and our approach to avoiding and preventing Modern Slavery and Human Trafficking

e) The action we have taken to ensure that the potential for slavery and human trafficking is significantly reduced both with our suppliers, employees, and contractors

5.1.5 We will continue to tell the companies we do business with that we are not prepared to accept any form of human exploitation.

5.1.6 We will ensure that all our sub contractor's contracts contain anti-slavery and human trafficking clauses. The clauses, which flow down through all layers of our supply chain, will prohibit suppliers and their employees from engaging in slavery or human trafficking.

5.1.7 We will ensure that we can account for each step of our supply process, and that we know who is providing goods and services to us and we have mechanisms and processes in place to check, including:

a) mapping our suppliers.

b) risk assessments for suppliers and questionnaires for new and existing suppliers.

c) supplier audits.

5.2 General Recruitment

a) We will ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

b) We will ensure staff are legally able to work.

c) We will the names and addresses of our staff (several people listing the same address may indicate a high shared occupancy, often a factor for those being exploited).

d) We will provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

5.3 If, through our recruitment process, we suspect someone is being exploited, the recruitment team will follow our reporting procedures (See Reporting slavery).

6. Identifying slavery

6.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim:

6.2.1 The person is not in possession of their own passport, identification, or travel documents.

6.2.2 The person is acting as though they are being instructed or coached by someone else.

6.2.3 They allow others to speak for them when spoken to directly.

6.2.4 They are dropped off and collected from work.

6.2.5 The person is withdrawn, or they appear frightened.

6.2.6 The person does not seem to be able to contact friends or family freely.

6.2.7 The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

6.2.8 A person may display several the trafficking indicators set out above, but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the persons circumstances which may indicate something is not quite right.

6.3 If you have a suspicion, report it to your manager

7. Reporting slavery

7.1 Talking to someone about your concerns may stop someone else from being exploited or abused.

7.2 If you think someone is in immediate danger, call the security lines

7.3 Otherwise, you should discuss your concerns with your direct supervisor

7.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with your direct supervisor before taking **any further action.**

8. Monitoring our procedures

8.1 We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.



Chris Idisi
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