

Modern Slavery Statement of Hertel UK

16th November 2018

Introduction

This is the modern slavery and human trafficking statement of Hertel UK. This statement is made pursuant to s.54(1) of the UK Modern Slavery Act 2015 (the “Act”) and has been adopted by Hertel UK as its slavery and human trafficking statement for the financial year ending 31 August 2018.

The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking. Hertel UK is committed to combatting all such forms of modern slavery.

Slavery and human trafficking are abuses of a person’s freedoms and rights. Hertel UK is totally opposed to such abuses in our direct operations, our indirect operations and our supply chain as a whole. We are proud of the company’s ethical stance and steps we have taken to uphold it. Slavery and human trafficking will not be tolerated in any part of our business or our supply chain.

Corporate Structure

Hertel UK which is part of the Altrad Group, is a leading multi-disciplinary, industrial services company. It supports its customers with access solutions, insulation, corrosion protection, mechanical and specialist services. Hertel is working for customers in the Oil and Gas, Process and Energy industries in the UK and Republic of Ireland. The Head Office is based in the UK.

Hertel UK operates a number of National and Site Agreements in respect of remuneration and working conditions and in doing so recognises the trade unions which operate in the industry.

Anti-Trafficking/Slavery Policies

Hertel UK’s Code of Conduct and Ethical Practices Policy provides the foundation for our business culture and underscores our commitment to performance with integrity and respect for human rights. The Code of Ethics provides guidelines for employee conduct and affirms our commitment to uphold our core values, such as our commitment to our employees, standards for doing business, and our relationship with our communities. We embrace the Code of Conduct and Ethical Practices every day and in every business dealing across the company.

Our policy on Third-Party Business Dealings, within the Code of Conduct, includes our responsibility to follow all applicable laws as well as our own internal policies and to require any supplier or third party who works with Hertel to comply with similar fundamental principles.

Anti-Trafficking/Anti-Slavery Due-Diligence Processes

Hertel UK has appointed its Human Resources Director as its senior compliance officer (its Anti-Slavery and Human Trafficking Officer) and will take appropriate steps to ensure not only its own compliance but also that these requirements are followed by its suppliers, sub-contractors and/or business partners.

Our Supplier selection process is reviewed regularly to ensure best practice is being followed. One section of the process is dedicated to Ethical practices by the supplier organisation. Copies of policy documentation and details of steps taken must be provided by the supplier. This

information helps in the final supplier assessment and whether Hertel UK is satisfied that there are ethical standards in place.

If we discover evidence of slavery or human trafficking with one of our suppliers through this process, we will refrain from doing business with this supplier and will report such conduct to the relevant authorities, as appropriate.

Supplier Requirements

- Suppliers must not use child labour and are requested to operate in accordance with the ILO convention.
- Compensation and benefits must comply with fundamental principles relating to minimum wages, overtime hours and legally mandated benefits.
- Any form of forced or compulsory labour must not be used, and employees shall be free to leave employment after reasonable notice.
- Suppliers are expected to adhere to the right of employees to freedom of association and recognition of employees' rights to collective bargaining, in accordance with local law.
- Workers must have safe and healthy working conditions that meet or exceed applicable standards for occupational health and safety.
- Suppliers must require their own direct suppliers to adhere to the principles of the Supplier Code of Conduct and exercise diligence in verifying that these principles are being adhered to in their supply chains.

Anti-Trafficking/Anti-Slavery Training

Hertel UK support staff and managers receive training on the Ethical Practices and related policies. Employees are encouraged to report compliance concerns to their line manager and/or Human Resources Department. Any allegations will be investigated in a timely manner. Any confirmed breaches of the company's standards will be addressed with corrective actions, which may include employee discipline or dismissal or supplier contracts being terminated.

Relevant Policies

- Code of Conduct
- P8 & P9 Supplier Questionnaires
- Ethical Practices Policy
- Human Resources Policy
- Recruitment & Retention Policy & Procedure



David Fitzsimons
Managing Director