



# PD&MS ENERGY (ABERDEEN) LIMITED

## MODERN SLAVERY ACT

### PUBLIC STATEMENT 2017

#### Introduction

This statement sets out PD&MS Group's actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in our business or supply chains.

We support the principles of the Modern Slavery Act and the abolition of modern slavery and human trafficking and recognise that we have a responsibility to take a robust approach to slavery and human trafficking. This statement relates to actions and activities during the financial year 30 June 2015 to 1 July 2016.

#### Our Organisational Structure and Supply Chains

We are a multi-disciplined engineering Company skilled in brownfield engineering with our core activities being:

- Detailed design and engineering
- Site Surveys
- Dimensional control and laser scanning
- HVAC engineering and maintenance
- Procurement and package management
- Construction and commissioning
- Consultancy
- As build closeout

Our supply chain includes the sourcing of capable Contractors and Employees to allow the delivery of our engineering works.

#### Countries of Operation and Supply

PD&MS Group is a trading name of PD&MS Energy (Aberdeen) Limited and has its Head Office in the United Kingdom and a branch office in Azerbaijan.

In both countries we undertake engineering works to enable the safe maintenance of brownfield platforms.

We maintain a Corporate Risk Register which is reviewed on a regular basis which will identify any potential risk related to slavery or human trafficking. This would identify the risk and control measures to mitigate the risk.

#### What does PD&MS Group already do?

Our recruitment and people management procedures ensure that all prospective personnel are legally entitled to work in the UK or Azerbaijan and to safeguard personnel from any abuse or coercion once in our employment. They include:

- Employee Code of Conduct
- Pre-employment checks – right to work, work permits, references
- As a minimum, payment of the National Minimum Wage
- Overtime working is on a voluntary basis and we comply with contractual obligations regarding overtime payments
- Grievance, disciplinary and whistleblowing procedures
- Health and safety policies and procedures

We work with a wide range of different suppliers which can increase a modern slavery risk. We will continue to work with our staff, partners and contractors to ensure we meet the expectations of the Modern Slavery Act.

#### What changes are we making?

- We are raising our awareness among our staff of the Modern Slavery Act, including its definitions of slavery and human trafficking and providing training to appropriate employees on how to respond if a case of slavery or human trafficking is suspected as well as internal promotion of slavery and trafficking identification and what external help is available for example through the Modern Slavery Helpline
- We are revising our procurement guidelines to include reference to the Act
- We are amending our Whistleblowing Policy
- Our Senior Leadership Team are taking ownership for actions arising from this statement

#### What changes will we make?

- We will carry out a modern slavery risk assessment
- We will contact suppliers and partners in potentially higher risk categories to



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- check what assurance arrangements they have in place
- We will adapt existing policies and procedures to reference the Modern Slavery Act 2015 / Modern Slavery Transparency Statement
  - We will learn from cases which may arise in other similar Companies and amend our policies and procedures accordingly

### Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews will be expanded to include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier;
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;

- Conducting supplier audits or assessments through, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans;
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or fall short of our expectations, including the termination of the business relationship.

### Contact

Questions, comments and requests regarding this statement are welcomed and should be addressed to [phr@pdms-group.com](mailto:phr@pdms-group.com).

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes PD&MS Group's Modern Slavery Transparency Statement for the current financial year.

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This statement has been approved by the Board of PD&MS Energy (Aberdeen) Limited Signed

Simon Rio  
Chief Executive Officer August 2016