

21<sup>st</sup> January 2020

## **Modern Slavery Statement**

### **Introduction**

This statement has been published in accordance with the Modern Slavery Act (2015). It sets out the steps taken by Altus Intervention Limited during the financial year ending 31<sup>st</sup> December 2019 to prevent modern slavery in our business operations and supply chains.

Slavery, servitude, forced labour and human trafficking (Modern Slavery) are issues of increasing global concern, affecting all sectors, regions and economies. Modern Slavery is fundamentally unacceptable within our business and supply chains and is an important element in our overall approach to business and human rights. Altus Intervention has a strong commitment to being a responsible business and in this statement we provide details of how our company operates and the steps we have taken to help give comfort that modern slavery is not taking place in our supply chains or any part of the business.

### **Our Policy**

Altus Intervention are working towards establishing a zero-tolerance policy on Modern Slavery. We have a number of policies and procedures in place to minimise the risk of Modern Slavery within our Supply Chain. Links to the policies can be found at the end of this document.

Although the main responsibility for compliance with Modern Slavery lies within HR and Management, all employees have a responsibility to understand, identify, and address any issues related to Modern Slavery.

### **Our Structure and Supply Chains**

Altus Intervention, owned by Swedish private equity firm, EQT currently employs approximately 1000 employees globally with operations across 4 regions; UK and West Africa, Norway and Denmark, Americas and Middle East and Asia Pacific.

Altus Intervention has approximately 600 suppliers, from a varied range of sectors for example from accommodation to downhole tools and insurance to PPE suppliers.

### **Our Procedures**

We have a number of procedures in place to ensure compliance with Modern Slavery.

We operate a fully compliant Employment Process through recruitment and benefits, which is supported by our People Policy. Our People Policy outlines the standards in which we expect our employees to operate and contains details of Whistleblowing. Our Business Ethics Policy also ensures our Employees operate ethically in all matters and if anyone suspects any non-compliance they can refer to the Whistleblowing section of the People Policy. Links to both policies can be found at the end of this statement.

All Vendors of Altus Intervention must sign a Vendor Declaration form stating that they comply with the UN Declaration of Human Rights and any other international laws and codes of conduct where applicable. Our Procurement policy states that our Vendors, irrespective of size, are expected to comply with the specifications outlined in the Vendors Declaration. Should any Vendor be found to use modern slavery in any part of their supply chain and/or their business,

Altus Intervention have the right to treat this as a material breach of contract and terminate immediately.

Our Procurement department have an online procurement tool to manage our approved Vendors. The Procurement team maintain a record of all our approved Vendors and as such, this allows us to regularly review and monitor our vendors to ensure they are compliant with Altus Intervention specifications. If we are not satisfied with a Vendor's position on Modern Slavery, we will not appoint the Vendor or will terminate the existing contract immediately or at the point of contract renewal.

### **Due Diligence**

Altus Intervention carries out comprehensive due diligence on all suppliers and has developed clear and robust procedures to ensure compliance by suppliers. As mentioned previously, all suppliers must complete a Vendor Declaration form stating that they comply with the legislation. We have an internal team responsible for ensuring completion of the Declaration forms and should any supplier refuse to comply we will not enter a relationship with them.

### **2019**

Over the last 12 months Altus Intervention have undertaken the following activities:

- Included information on Modern Slavery Act (2015) within Company inductions.
- Strengthened our Risk Assessment procedures and heightened our focus on supply chain.
- Conducted a review of our Supply Chain procedures to ensure our Due Diligence is comprehensive
- The employment handbook has continuously been reviewed with consideration to the Modern Slavery Act (2015).

### **Going Forward**

In 2020 we will continue to raise awareness of the Modern Slavery Act 2015 and ensure compliance in all global locations that we operate in.

### **Link to Policies and Procedures**

People Policy  
Business Ethics

Vendor Declaration Form  
Supply Chain Procedure

### **Approval**

This statement has been approved by the Directors of Altus Intervention UK and signed on their behalf



**Garry Michie**  
President Altus Intervention UK  
Director Altus Intervention



**Donald Prentice**  
Vice President Finance  
Director Altus Intervention