

# MODERN SLAVERY AND HUMAN TRAFFICKING

KCA Deutag is an international drilling and engineering company working onshore and offshore, with a focus on safety, quality and operational performance. Headquartered in Scotland, the group operates in approximately 20 countries across the world.

At the heart of our operations are our Core Values and the KCA Deutag Way which define the behaviours of our employees and how we work as a company. KCA Deutag is committed to complying with the requirements of the Modern Slavery Act 2015 ('The Act') and this statement sets out the steps taken by KCA Deutag's relevant UK incorporated entities, during the financial year ended 31 December 2021 to show such commitment.

## The KCA Deutag Way and Core Values

At KCA Deutag, we believe in operating the KCA Deutag Way. This defines the type of company that we are and will continue to be for our people, our clients, the environment and the communities in which we operate. It is a global approach that every person in the company believes in.

Our shared Core Values are the foundations that enable us to achieve this, guiding our business approach and culture, and governing the behaviours of our employees and how we work as a company. This foundation is supported by a policy framework which includes worldwide standards, policies and procedures, pragmatic work guidelines that complement these core behaviours and help us live and work by our values. It governs how we behave as colleagues and as a company.

Integrity is central to our business. We believe in doing the right thing and are committed to acting ethically, with integrity and transparency in all our business dealings. Our relationships with employees, customers and suppliers are built on a foundation of respect and fairness. These values support a positive culture across the organisation and are embodied in the policies which all our employees, and the companies we deal with, must comply with.

To support these, we have a confidential helpline in place for all our employees and contract staff in KCA Deutag and for third parties with whom we have a business relationship so they can raise concerns and report instances of potential non-compliance with our values and principles, in full confidence and without fear of retaliation. Respect for human rights and provision of remedy for potential non-compliance are ways in which we uphold our core values.

## Our Supply Chain

Our operations in the UK are supported by a supply chain for goods and services. Prior to engaging with any supplier, we undertake detailed due diligence and risk assessment, and will not do business with any individual or organisation which has been unable to demonstrate compliance with our values. In addition, our standard contracting principles require any supplier to confirm that they will comply with all applicable laws specifically referencing relevant child labour or slavery legislation.

# MODERN SLAVERY AND HUMAN TRAFFICKING

Our Supplier Code of Conduct prohibits the use of forced labour and child labour by our suppliers. It also requires our suppliers to respect the employment rights of their workers and requires our suppliers to use reasonable efforts to promote compliance with the Supplier Code of Conduct amongst their own suppliers.

## Training

Our core values are embedded within our organisation and supported by ongoing training to all our employees around our behavioural framework and global business ethics.

In the next 12 months relevant employees from appropriate functions will undertake specific training in relation to recognising and understanding the risk associated with modern slavery and human trafficking. In addition, there will be fresh emphasis on our whistle-blower provision, for all members of staff, providing the necessary vehicle for reporting any concerns in relation to modern slavery or human trafficking.

## Continuous Improvement

We continue to monitor our business and our supply chain, through continued due diligence and supplier audits, for association with slavery and human trafficking and continuously improve our approach to managing any future risks to our organisation.

Allegations of any practices running contrary to our values will be investigated and may result in suppliers being required to develop corrective action plans backed up by onsite audits. In addition, contracts may be terminated if suppliers breach, or we suspect that they are in breach of their contractual obligations.

## Objectives

Over the next 12 months we will implement the following objectives as part of our commitment under the Act:

- Due to operational issues, planned modern slavery and human trafficking training for 2021 had to be rescheduled to 2022.
- An audit of our compliance program and associated policies and procedures by independent external law firm is underway. In addition, a Senior Ethics & Compliance Manager has been recruited and is evaluating the groups compliance program in this and other areas.

## Approval

This statement was approved by the Board of Directors for each entity on 23 August 2022 and constitutes our slavery and human trafficking statement for the financial year ended 31st December 2021.

Signed for and on behalf of the relevant entities\*.



Joseph Elkhoury  
Chief Executive Officer

\*relevant UK incorporated entities are Abbot Group Limited, KCA Deutag Drilling Limited and KCA Deutag (Land Rig) Limited).