



Modern slavery and human trafficking policy



Group corporate services

Modern slavery and human trafficking policy

Contents

1. Policy scope	1
2. Policy statement	1
3. Responsibility for the policy	1-2
4. Compliance	2
5. Communication	2
6. Breach of the policy	2
7. Document revision history	3



Group corporate services

Modern slavery and human trafficking policy

1. Policy scope

This policy does not form part of the terms and conditions of employment and does not impact upon an employee's statutory rights. The Company reserves the right to amend, withdraw or replace this policy at any time.

This policy supersedes any previous Modern slavery and human trafficking policy with effect of 20 January 2022.

This policy applies to James Fisher and Sons plc ("Company") and all subsidiary companies of the James Fisher Group (the "Group") and is global. The policy applies to all employees of the Group, defined as any employee of the Company or its subsidiaries.

For clarity, the term 'employees' refers to both employees and workers of the Group at all levels.

2. Policy statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and our standard contract terms include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, at all levels and grades, including directors, officers, senior managers, employees (whether permanent, fixed-term or temporary), agency workers, seconded workers, homeworkers, casual workers, sponsors, trainees, agents, contractors, external consultants, third-party representatives and business partners, or any other person associated with us or any of our subsidiaries or their employees wherever located (referred to as "workers" in this policy).

As available to our workers (as defined below) on our Group intranet, Section 4, Suppliers and Purchasing, to our latest version of the Group Internal Control Procedures Manual sets out the steps that our workers are required to take to minimise the likelihood of transacting with inappropriate or fictitious suppliers and ensure adequate procedures that comply with legislation including the Modern Slavery Act 2015.

3. Responsibility for the policy

The James Fisher and Sons plc board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Executive Officer has primary responsibility for implementing this policy and monitoring its use and effectiveness across the Group. Each trading company Managing Director will have the primary and day to day responsibility within their respective businesses for implementing this policy, monitoring its use and effectiveness,



Group corporate services

dealing with any queries about it, maintaining all required records, and identifying and reporting any incidents which may contravene the Group Statement or Policy to their local Board and to the Chief Executive Officer.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given training as appropriate.

Workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

4. Compliance

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur or if you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you should raise this with your Managing Director. Concerns may also be reported by following the procedure set out in the Group's Whistle Blowing Policy. A copy of the Whistle Blowing Policy can be obtained from your line manager, Group HR or the Group Company Secretary.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Executive Officer or your local Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Policy and Procedure, which can be found in the Group HR Manual. The Manual is available online or from the Group Head of HR.

5. Communication

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. Breach of the policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

This policy does not form part of any employee's contract of employment and we may amend it at any time.



7. Document revision history

Policy name	Version number	Function	Owner	Date last updated	Precis of change	Updated by	Approved by
Modern slavery and human trafficking policy	V.1	Group Legal	General Counsel & Company Secretary	2017	New policy	-	Board
Modern slavery and human trafficking policy	V.2	Group Corporate Services	General Counsel & Company Secretary	2022	Reference to supplier due diligence	Richard Fox	Board