



MODERN SLAVERY & HUMAN TRAFFICKING POLICY



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT
Management Team, Business Managers, Staff

Dear Colleagues,

It is important to WTS Energy's continued success that its policies concerning **MODERN SLAVERY & HUMAN TRAFFICKING** be clearly communicated throughout the whole organization.

Modern slavery encompasses slavery, servitude, human trafficking and forced labor. WTS Energy has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, and with integrity and transparency in all business dealings; putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain.

To help ensure this practice, this statement sets out the organization's actions to understand all potential modern slavery risks related to its business and the steps in place aimed at ensuring there is no slavery or human trafficking in its business and its supply chains.

At every level and in every part of the organization, our values must guide and align our behavior as we make business decisions and operate on a day-to-day basis.

Thank you for your ongoing commitment to ensure that, together, we are all living the values that will help us achieve our vision. If you have any queries on how the Code will operate, then please raise them initially with your line manager.



Jean Paul de Jong
CEO

PURPOSE OF THIS POLICY

This policy sets out WTS Energy's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. WTS Energy maintains relationships with many different organizations in its supply chain, as well as directly employing large numbers of people.

In the light of the general law on employment and human rights and more specifically, the Modern Slavery Act 2015, the Company is fully committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chain is free from slavery and human trafficking.

We are committed to acting ethically and with integrity in all our business transactions and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our businesses and supply chain.

This policy sets out our approach on modern slavery and explains how Employees can identify instances of this and where they can go for help and guidance.

Following the initial adoption of this policy, this will be reviewed by the Company's Directors on a regular basis and may be amended from time to time.

ORGANIZATIONAL STRUCTURE AND SUPPLY CHAINS

This policy covers all the activities of WTS Energy and its subsidiaries. It governs all our Business dealings and the conduct of all persons or organizations with whom we contract directly or who we appoint to act on our behalf.

We expect all, who have, or seek a business relationship with WTS Energy and/ or any member of our Company, to familiarize themselves with our Anti-Slavery Policy and to act always in a way which is consistent with our Anti-Slavery Policy.

WTS Energy is a Netherlands-Headquartered Manpower & Recruitment Company, providing Manpower services globally to mainly the Oil & Gas and Energy sector.

The Company currently has offices in 21 countries in the following continents: Asia, Africa, North America & Europe

RESPONSIBILITY

The Operations department will liaise with other relevant departments such as the QA & Compliance and the Legal team to ensure that risk analysis and investigations/ due diligence in relation to modern slavery and human trafficking is carried out as required.

Operations will ensure that all Employees are given adequate regular training on the issue of modern slavery so that everyone understands and complies with this policy.

RELEVANT POLICIES & PRACTICES

WTS Energy operates the following policies & practices that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

The Company's policy on whistleblowing encourages all its Employees, Customers, and other Business Partners to report any concerns related to the direct activities of the organization or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The Company's whistleblowing procedure is designed to make it easy for Employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the Company's Whistleblowing Policy which is available on the Company intranet. The nature of the complaint will determine the Company's next course of action.

We endeavor to carry out our own recruitment activities and/or to only use reputable employment agencies to source labor and we carry out appropriate background checks. Personnel responsible for the recruitment activities in any of the subsidiaries are advised to adhere to this policy by ensuring that strict verification of potential Employee's right to work is carried out before any offer of employment is made.

WTS Energy expects its subsidiaries and all supply chain to adhere to recruitment practices that ensure that all terms of employment are voluntary. Where necessary and if required, we may request a demonstration of compliance with this policy.

AWARENESS & PERFORMANCE INDICATORS

Besides a training practice, the Company will raise awareness of modern slavery issues by emailing the Company's Anti-Slavery and Human Trafficking Policy to all Employees as well as it being made available on the Company's intranet.

Further to this, the Company plan to continue to create awareness on modern slavery issues through training workshops and annual update communications.

Our zero-tolerance approach to modern slavery will be communicated to all Suppliers, Contractors and Business Partners at appropriate points during our business relationship with them and reinforced as appropriate thereafter.

To conclude, the Company understands modern slavery risk is not static, therefore, we will continue to mitigate this risk and review our Key Performance Indicators to ensure effective systems and controls are in place to safeguard against any form of modern slavery taking place within our Business or supply chain.