

# Anti Slavery and Human Trafficking Statement



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*This statement is pursuant to the Modern Slavery Act 2015 and relates to actions and activities during the financial year 2023 [1st January 2023 to 31st December 2023]*

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## Commitment

Xodus is committed to ensuring that there is no modern slavery or human trafficking in any part of corporate activities or in supply chain.

Xodus is committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

## Relevant Information About Xodus

Xodus is a global Energy Consultancy with over 350 technical experts delivering leading services and products to help our Clients address challenges across all stages of an Energy development. With expertise across oil and gas, offshore wind, hydrogen and carbon capture, utilisation and storage, we are at the forefront in enabling the Oil and Gas Industry to transition to Net Zero. We have the skills and experience to identify opportunities to decarbonise existing assets whilst optimising performance, and the knowledge and creative thinking to explore ways to integrate New Energies.

From Appraise and Select development stages through design, commissioning, operation and decommissioning, our integrated teams have helped clients identify and develop optimum solutions to maximise return on investment over the asset lifetime. More details about our business can be found at: <https://www.xodusgroup.com/this-is-what-we-do/>

As part of the energy industries worldwide Xodus recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

## Geographies

Xodus Group currently operates across the globe. We have established presence across United Kingdom , Middle East, Australia, United States and Japan. More details can be found at: <https://www.xodusgroup.com/this-is-where-we-are/>

Scope of provided business activities in all countries is assessed as low risk in relation to slavery and human trafficking.

## Employees and Other Staff

As of 31 December 2023, the number of personnel, including direct employees, agency and contract staff working for Xodus was:





# Modern Anti Slavery Statement

Direct Employees: 506

Contractor/Associate/Other: 156

## Supply Chains

Xodus operates and aims to conduct its business with limited exposure to the supply chain and contractors for provision of services. Where independent services are being utilised, these often are: office maintenance, cleaning, security, provision of training, HR and accounting services. On occasion, we engage with specialised service providers for i.e. laboratory and analytical work, supply of marine data.

In 2023 we have improved our Supply Chain Management and Procurement protocols by:

- introducing new Supply Chain Procurement Process;
- introducing Code of Conduct for Suppliers;
- improving our qualification procedures for our direct suppliers,
- enhancing due diligence process for suppliers considered as high risk.

All suppliers are contractually required to comply with our values and business ethics including anti-corruption and human rights, and with policies in relation to safety, quality and environmental; and to require their own suppliers to operate to the same standards. Noncompliance with our business ethics and values results in termination of contract.

## Relevant Policies and Procedures

Xodus Group operates the following policies and procedures that aid the identification of the modern slavery risks and human trafficking in its operations:

### Code of Conduct

The Xodus Code of Conduct (the Code) is applicable to all personnel working for and on behalf of Xodus globally, including direct employees, agency and contract staff. The Code sets out our commitment to conducting business fairly and ethically, including by treating our employees, clients, contractors and suppliers fairly and with respect. It also provides guidance on how to ensure we uphold our commitments.

All Xodus direct employees are required to take an e-learning module on the Code of Conduct on joining the business.

### Code of Conduct for Suppliers

The Xodus Code of Conduct for Suppliers is incorporated into our standard terms and conditions for suppliers. It includes mutual commitments to:

- Ethical business conduct, including with regard to anti-corruption
- Health, safety, and security.
- Human rights and fair and lawful employment practices across Xodus and throughout our supply chain.
- As a minimum, complying with national legal requirements regarding wages and working hours.
- Support the International Labour Organisation's standards regarding child labour and minimum age.
- Prevent modern slavery and human trafficking anywhere in our business or supply chain.
- Uphold the same standards when dealing with employees, contract staff and sub- contractors.





# Modern Anti Slavery Statement

## Communication, Education and Training

Xodus undertakes annual training for all personnel to ensure that the Xodus Code of Conduct is fully understood and properly applied, and that staff understand and help to uphold company commitment to doing business ethically and with integrity, including with regard to its human rights commitments. The training is overseen by the Compliance Manager and delivered by interactive e-learning.

## Speak Up Channels and Culture; and Grievance Procedures

We have a clear Speak Up Policy, which is summarised in the Code of Conduct and explained in fuller detail in a separate policy. It offers various channels for raising concerns, including an externally administered and monitored confidential reporting line (Safecall). All personnel are encouraged to utilise one of these reporting channels if they become aware of a possible breach of our Code of Conduct or have concerns in respect of unethical conduct, including human rights breaches.

If individuals working for us (whether as employees or contract staff) have a grievance about unfair labour practices, they are encouraged to use local grievance procedures, which are widely communicated and available to all our staff.

## Specific Steps Taken During The Year Ending 31<sup>st</sup> December 2023

For ease of reference, specific steps taken by Xodus during the year ended 31 December 2023 to address the risk of slavery and human trafficking taking place within our own operations and supply chains include:

- Completion of enhanced risk assessments of our own operations in line with requirements set by company shareholder;
- Completion of the human rights assessment in line with requirements set by company shareholder;
- Improvements to Supply Chain Management and Procurement protocols.

## Approval and Updates

This statement has been approved by the Xodus Leadership Team, who will review and update it annually.

Stephen Swindell

Chief Executive Officer

17<sup>th</sup> April 2024

