

MODERN SLAVERY ACT

INTRODUCTION

We, Survitec Group, are proud of the steps we take to combat slavery and human trafficking and are committed to improving our practices going forward. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and improving effective systems, controls and practices to ensure modern slavery is not taking place in our supply chains.

We are also committed to ensuring there is transparency in our own business. We believe that for people to excel, they must feel valued and included. We make certain that everyone is treated fairly, honestly and respectfully, and we expect the same standards from all our contractors, suppliers, third parties and other business partners.

OUR BUSINESS

We are a global leader in survival and safety solutions to the marine, defence, aviation and energy markets. We have around 3000 employees worldwide, covering 8 manufacturing facilities, 15 offshore support centres and over 50 owned service stations. We are further supported by a network of over 500 third party service stations and distributors. We are a class-approved service provider with ISO 9001 certification, the international standard for quality management systems.

Throughout its 160-year+ history, Survitec Group has remained at the forefront of innovation, design and application engineering and is the trusted name when it comes to critical global safety and survival solutions.

OUR STRUCTURE

Our business comprises the parent company, Survitec Group Limited, along with numerous subsidiary companies operating worldwide. Survitec Group Limited's head office is in the United Kingdom.

This statement applies to Survitec Group Limited and its subsidiaries as set out above.

OUR SUPPLY CHAINS

Our supply chain includes the manufacture, sourcing, procurement and delivery of raw materials, components, finished products and related servicing of life saving equipment for end customers who are principally in the marine, defence, aviation and energy markets.

We buy from approximately 450 material suppliers in 4 countries. These suppliers are largely based in countries with a lower risk of modern slavery.

OUR POLICIES

We strive to act ethically and with integrity in our business relationships and we expect high standards from our employees as well as our contractors, suppliers, third parties and other business partners. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have in place certain policies that aim to encourage and develop these standards of behaviour.

Code of Business Conduct & Ethics

Our Code of Business Conduct & Ethics sets the standard for how we operate our business and how our staff conduct themselves with the highest levels of integrity, honesty, ethical conduct and compliance with the law. It aligns with and reflects our core Values – Safety, Customers, People, Excellence, Innovation and Integrity.

Supplier Code of Conduct

Our Code of Conduct reflects our commitment to acting ethically and with integrity in our business relationships. The Code underlines the commitment that business should be conducted lawfully and ethically. It outlines the principles that work should be conducted on a voluntary basis and that workers should be treated with respect and dignity. In particular, our Code makes clear that slavery and human trafficking in any form should not be taking place in supply chains.

Our Supplier Code of Conduct has replaced our Responsible Sourcing Policy. The Supplier Code of Conduct builds on the commitments in the aforementioned policy and addresses new workforce issues including but not limited to (i) slavery, human trafficking and child labour; (ii) human rights; (iii) equal opportunities; (iv) freedom of association and collective bargaining; (v) working environment; (vi) working hours; (vii) wages and remuneration; and (viii) environmental responsibility.

The new Supplier Code of Conduct includes prescribed standards such as those of the International Labour Organisation. All material suppliers are asked to sign the Code of Conduct and supply supporting evidence of their compliance on request. Such compliance may be monitored as part of the supplier's audit.

Modern Slavery Policy

Our Modern Slavery Policy communicates our zero-tolerance approach to modern slavery and that we are committed to acting ethically and with integrity in all our business dealings and relationships. It outlines our commitment to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within our business or supply chain.

The Policy applies to all our employees, contract workers, officers and directors. It also applies to individuals, companies, associations, partnerships, or other entities retained to act on our behalf of or for our benefit, and includes, but is not limited to, consultants, representatives, agents, brokers, lobbyists, distributors, and resellers.

The policy encourages employees to report any actual or potential violations of law, regulations or the policy of which they become aware. There is a Survitec Hotline where all of those involved in Survitec's operations, including suppliers, customers and employees, are able to report concerns anonymously and, if employees have any concerns relating to slavery, they can report these concerns via this route.

No instances of non-compliance with the Group's Modern Slavery policies have been identified to date.

KEY PERFORMANCE INDICATORS

We will continue to monitor the following key performance indicators to assess how effective we have been in ensuring slavery and human trafficking is not taking place in any part of our business or supply chain including the following:


- Continuing to strengthen our risk assessment and due diligence processes for the onboarding of suppliers and customers;
- Arranging audits and inspections of our suppliers where appropriate;
- Continuing to include language with respect to compliance with anti-slavery and human trafficking laws and policies in all new supplier and all new third-party contracts;
- Ensuring that all new employees are aware of our Modern Slavery Policy.

FUTURE STEPS

We will deliver refresher training on our Modern Slavery Policy to all relevant employees in 2023. This will include, but will not be limited to, the Modern Slavery Act 2015 and shall cover:

- Provisions of the Modern Slavery Act 2015;
- How to identify the signs of slavery and human trafficking;
- What initial steps should be taken if slavery or human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2023.



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Robert Kledal

Chief Executive Officer