

Oil Spill Response Limited

Anti-slavery and human trafficking statement

1: Opening statement from senior management

Oil Spill Response Limited is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. Oil Spill Response Limited (OSRL) is an industry owned co-operative comprising 39 shareholders which are global energy companies. OSRL exists to respond effectively to oil spills wherever in the world they occur. OSRL 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 and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or our supply chain. Our culture does not in any way condone slavery or human trafficking and we would not entertain continuing business with any entity which did not adopt a similar view and position.

OSRL shareholders have approved amendments to their membership agreements to incorporate specific commitments to Anti-Slavery and Human Trafficking.

2: Structure of the organisation

OSRL operates worldwide and is ready to respond to our members on an around the clock basis. The group has permanent bases in the following countries:

United Kingdom
Singapore
United States of America
Bahrain
Norway
South Africa
Brazil
Ghana
Australia

OSRL's supply chain is predominantly based in these markets with our primary costs being; our staff, spill response equipment, spill response aircraft and our buildings. OSRL also operates in many other countries around the world as required by our members. As an industry owned collective we seek to adopt the best practices of our members in all areas of our business. OSRL's Anti-Slavery Policy Statement reflects our commitment 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.

To find out more about the nature of our business, please click [\[insert link to website\]](#).

3: Policies

OSRL has various policies, procedures and requirements documented in our Integrated Management System which are aligned to ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007. Within our integrated management system, the policies we already have in place which are relevant to guarding against modern slavery and trafficking taking place within our business are:

- Human resources policy: we operate a robust recruitment policy, including conducting eligibility to work checks for all employees to safeguard against human trafficking or individuals being forced to work against their will
- Whistleblowing policy: we operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals
- Staff training as a part of our induction process onboarding new staff
- Annual refresher training for all employees

4: Due diligence

There is a risk of slavery and human trafficking across our business, this risk is managed across all our permanent bases through the existing policies and procedures detailed above. As a response organisation, which may be called upon to operate in any area of the globe, including countries where the risk is perceived to be high, there is deemed to be an increased risk in respect of temporary operations in any such country. This increased risk is managed through a detailed risk assessment process with input from the group legal function as required to ensure normal work practices are always maintained.

5: Risk and compliance

Our approach towards Modern Slavery is a part of our focus on all areas of Compliance and is both integral and inextricably linked with our wider holistic suite of compliance practices including Anti-Bribery and Corruption, Sanctions, and awareness of possible financial irregularities.

We enforce a strict code of compliance and do not tolerate breach within our supply chains. For example, if we find evidence of a failure to comply with our policies we may immediately seek to terminate our relationship with the relevant supplier.

6: Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Examples of training courses we have administered over the past year include:
Modern Slavery and Human Trafficking through an iHasco provided training module

7: Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking: Following the commitment of OSRL Shareholders, similar provisions will now be incorporated into all other membership agreements and thereafter into OSRL procurements contracts.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Oil Spill Response Limited's slavery and human trafficking statement for the financial year commencing 1st January 2022 and ending 31st December 2022.

This statement was approved on 1st September 2023.

Signature:



Richard Morrish
Director
Oil Spill Response Limited
Date: 5th September 2023