

S54-Modern slavery statement for financial year to December 2021

Oil Spill Response Limited (OSRL) is an industry owned co-operative which 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 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
Australia
Ghana (joint venture)

OSRL's supply chain is predominantly based in these markets with our primary costs being; our staff, spill response equipment (including equipment storage and maintenance), spill response aircraft and our buildings. OSRL also operates in many other countries around the world as required by our members from time to time. 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.

This statement considers the 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

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. If necessary additional in country processes and checks would be put in place to ensure OSRL remains compliant during any response.

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.

Our procurement team have continued to expand our supplier audit process to include enquiry relating to our suppliers supply chain and how they comply with the Modern Slavery Act. Where possible we are looking for suppliers which also adhere to and hold ISO and OHSAS certifications

As a Response organisation OSRL may be required to onboard new suppliers local to a response site. OSRL has robust procurement processes and procedures which would be followed in such circumstances, OSRL would also liaise with our mobilising member to source suppliers which had already been subject to our members due diligence where possible.

It is acknowledged this is an ongoing and evolving area, our Shareholder Members and Industry as a whole are adopting compliance practices in this and other areas, and OSRL is sensitive to these new and evolving processes and is flexible in integrating these within our internal processes. The OSRL Board is actively investigating an evolution of process whereby Shareholder Members will formally commit to compliance with the Modern Slavery Act, irrespective of the jurisdiction in which the Member entity may be incorporated and registered and thereafter rolling this out as a contractual requirement in all other Membership agreements and in all contractor agreements in our supply chain.

We will monitor the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from supplier audits, internal audits, employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified. No such reports have been received at the point of publishing this statement.



Richard Morrish
Director
Oil Spill Response Limited

