

## **S54-Modern slavery statement for financial year ending December 2018**

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

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.

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

We have staff training as a part of our induction process for new employees and annual refresher training for all staff members. The refresher training is regularly reviewed and will be updated during the next financial year to become more robust.

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.

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

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.



**Declan O'Driscoll**  
**Director**  
**Oil Spill Response Limited**