

Modern Slavery Act, Annual statement 2023 from Ponticelli United Kingdom Ltd

This statement is made in accordance with Section 54, Part 6 of the UK Modern Slavery Act 2015 and sets out the steps taken by Ponticelli United Kingdom to prevent modern slavery in our business and supply chain, as well as our efforts to ensure the welfare of our workers.

Introduction

Ponticelli United Kingdom is part of Ponticelli Frères Group, a group of companies headquartered in France. We provide Engineering, Construction and Maintenance services to the Energy industry.

We intend to integrate social, environmental, ethical and human rights concerns into our operational strategy. These values and principles are strongly embedded in our Group's DNA and history. It illustrates our vision of transparent and exemplary business practices. As such, we are committed to maintaining and improving our processes to limit the risk of serious human rights violations, including modern slavery, throughout our supply chain and workforce (direct and indirect employees).

The Group's commitment towards human rights are based on the following international standards and initiatives :

- The Universal Declaration of Human Rights;
- The eight Fundamental Convention of the International Labour Organisation, which covers issues related to forced labour and slavery;
- The OECD Guidelines;
- The United Nations Global Compact, which the Ponticelli Group became a signatory of in 2017. This initiative supports universal environmental and social principles, including issues regarding human rights, labour, environment and anti-bribery.

Ponticelli Supply Chain

Ponticelli UK seeks to make a positive impact on the communities where we operate and do business. As part of our activities, we work with international companies to achieve our various purchasing needs but source most of the goods and services locally in the UK. Wherever they are based, vendors are fully considered as stakeholders of Ponticelli UK, and in this view, are expected to understand and comply with our company's standards.

As a result, Ponticelli UK has implemented a robust supplier qualification process :

- All Supply Chain partners are fully made aware of Ponticelli's Code of Ethical Conduct and our CSR and ethical reciprocal commitments.
- Due diligences are part of the Ponticelli UK accreditation process that sets out the standards of our company's ethical approach and engagements.

- Contracts are reviewed to ensure that Slavery and Human Trafficking have no place in their organizations or within their own sub supply chain.
- Compliance checks and audits are performed on a regular basis to ensure adherence to the countries legal working practices, and a full compliance of our vendor's activities with Ponticelli Ethics principles, including the complete absence of any Forced Labor and Slavery.

The Employment of Personnel in the UK

Ponticelli UK carries out right to work checks for all its Direct Employees, in line with government regulations. We ensure that all UK workers are employed in accordance with applicable laws and national legislation, including age requirements, working hours and conditions, and a wage in line with their position and competencies, by undertaking regular reviews of contracts and conditions.

Labour Agencies or Manpower providers are also actively monitored and audited to ensure they comply with UK regulations, but also with our values.

Relevant Policies in place within the organization

We are committed to a number of internal policies to ensure that we operate free of enforced labour, human trafficking and modern slavery. These include :

- Code of Ethical Conduct (GRP-SUP-RSE-172) which embodies our principles of integrity and the standard of conduct that is expected of the Ponticelli Frères Group's entities, employees as well as temporary employees and subcontractors. The Code of Ethical Conduct is a reference document for any employee who may be confronted with a moral or ethical dilemma within the scope of his/her role within the Group. It is complementary to our QHSE & CSR policies (Quality, Health, Safety, Environment and Corporate Social Responsibility) and translated into any work instructions.
- Ponticelli UK Employee's policies. Modern Slavery (ref PUK-HR-MAN-0007) is a stand-alone employee's policy engaging all our Employees, Managers and Directors to provide a working environment free from Modern Slavery and with full transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chain.
- Ethical Hotline and Alert procedure. Ponticelli Group has set out for all its subsidiaries and affiliates worldwide a clear and simple procedure to enable Employees and third parties to seek for guidance and advice in regards of ethical matters, including of course human rights. Thanks to a clear and straight-forward whistleblowing policy, Ponticelli also encourages all its employees to report any unethical behavior or failure to respect the Group's Code of Ethical Conduct either from its own employees or from any actor of its Supply Chain.

Training Effort

Training is one of the most critical components for an ethics and compliance program to be successful. There are different trainings in place within Ponticelli organization to ensure that all employees are familiar with our commitments and how this should be incorporated into our activities.

As such, our trainings cover all aspects of our ethics & compliance policies, including anti-slavery and human rights. Such trainings are mandatory for all employees, and reinforced for the ones who make decisions on behalf of Ponticelli UK and interact with our stakeholders.



Ponticelli UK Director
Olivier Laurendeau