



Modern Slavery Policy

A) INTRODUCTION

Epic International Limited is committed to complying with the requirements of the Modern Slavery Act 2015, (the 'Act'), under which companies in the UK have a responsibility to ensure that adequate controls are applied to ensure that slavery and human trafficking are not taking place in any part of its business or within its supply chain.

B) ORGANISATION

This statement applies to Epic International Limited (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year ended 30th April 2018.

C) ORGANISATIONAL STRUCTURE

The Organisation conducts all of its business from offices located in Great Yarmouth, UK with address EPIC International Limited, Vanguard House, Vanguard Road, Gapton Hall Industrial Estate, Great Yarmouth, Norfolk, NR31 0NT.

The Organisation provides operational, maintenance, personnel and logistics support to the oil, gas and renewables industry.

The services supplied by the Organisation in pursuance of its operations are carried out in the UK, Mainland Europe, Middle and Far East dependant on client's requirements.

D) DEFINITIONS

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement



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E) COMMITMENT

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chain.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK, Mainland Europe, Middle and Far East.

F) SUPPLY CHAINS

In order to fulfil its activities, the Organisation's main supply chain includes those related to provision of services in the oil, gas and renewables industry.

G) POTENTIAL EXPOSURE

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in the provision of labour and material from third party suppliers but will minimise its risk by utilising only reputable and industry known third party suppliers.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively low. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

H) STEPS

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.



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In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
- reviews suppliers to identify and assess the potential risks in its supply chain
- undertakes impact assessments of its services upon potential instances of slavery
- employs a zero tolerance policy towards slavery and human trafficking and expects those in its supply chain to comply with its values
- ensuring all employees are paid at least the minimum wage and have the right to work
- will not knowingly support or deal with any business involved in slavery or human trafficking

I) KEY PERFORMANCE INDICATORS

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- use of labour monitoring and payroll systems
- level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, its expectations

J) POLICIES

The Organisation has the following policies which further define its stance on modern slavery:

- Corporate Social Responsibility Policy
- Code of Ethics & Business Conduct Policy

K) SLAVERY COMPLIANCE OFFICER

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisations obligations in this regard.



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This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.