

1. OUR POLICY

This statement is made by Centurion Group Limited on behalf of its subsidiaries ("**Centurion**" or "**the Group**") pursuant to The UK Modern Slavery Act 2015 and the Fighting Against Forced Labour and Child Labour in Supply Chains Act in Canada. It sets out the steps the company has taken to prevent modern slavery, human trafficking and illicit labour practices across the supply chain and its general approach to such issues.

Centurion is continually striving to develop and enhance the working environment by fostering a sense of community across our business. We are committed to working to global standards of Human Rights ensuring that there is no modern slavery, human trafficking or child exploitation in our supply chains or in any part of our business. This reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls.

2. OUR ORGANISATION

Centurion provides equipment rentals, sales, services and project support to a range of critical end markets for complex, challenging and remote locations. The Group has a global reach with operations in five key regions: the US, Canada, UK & Europe, Middle East & North Africa and Asia Pacific.

Each of the regions operate a mix of business lines, these being:

- **Accommodation & Modular**
- **Power & Equipment**
- **Lifting and Cranes**
- **Water & Wastewater**
- **Pressure Control**
- **Subsea**

Centurion recognises that these operational characteristics can increase exposure to modern slavery and labour exploitation risks particularly where supply chains involve lower-tier suppliers, manufacturing activities or operations in jurisdictions with varying labour protections and enforcement standards. The supply chain is managed at a regional level with all local processes referring to Centurion's corporate policies and standards.

3. OUR GOVERNANCE AND LEADERSHIP

Oversight of modern slavery and human rights risks forms part of the Group's broader governance, compliance procurement and ESG framework. Such oversight involves the Board or Directors, Senior Leadership, Legal and Compliance, HSEQ, HR, Procurement and Supply Chain and Operational Management. Centurion's core values are central to the business and are incorporated into everything we do, every day. These behaviours are encouraged from the induction stage and are deeply engrained in the Centurion culture at every level of the business globally. Value led objectives are set and measured via employee performance reviews.

Our business is based on people and relationships, and our values reflect the behaviours we stand for:



We Care.



We develop and deliver fit-for-purpose solutions.



We actively share knowledge and insight.



We challenge the status quo.

Centurion has several policies in place to ensure that it is conducting business in an ethical and transparent manner. The Group maintains policies and governance controls including:

- **Business Ethics & Conduct Policy:** This is the overarching Policy that all Centurion employees and suppliers must comply with. It is the foundation of the Group Compliance programme and sets out the standards expected by Centurion when working in, with, or on behalf of the organisation.
- **Recruitment Policy:** Centurion's people -related policies, procedures and standards are underpinned by our Business Ethics and Conduct Policy. We operate a robust recruitment policy, including conducting checks on eligibility to work for all employees, to safeguard against human trafficking or individuals being forced to work against their will.
- **Whistleblowing Policy:** This policy aims to strengthen our speak up culture, to assist in identifying Centurion's speak up resources and provide reassurance that matters can be raised – anonymously if preferred – without the fear of retaliation
- **Whistleblowing & Ethics Hotline:** Aimed primarily at employees but also available to those working in our supply chain, the confidential reporting channels are managed by a third-party provider and can be accessed by telephone, smartphone or online on a 24/7 basis. Native language services are available if required. Reporters can also elect to make reports anonymously.

4. OUR SUPPLY CHAIN

Centurion procures goods and services from a global network of suppliers, manufacturers, subcontractors, labour providers and specialist services companies. It recognises that modern slavery and child labour risks may arise within global manufacturing, outsourced services, and subcontracting chains.

The Group supports the development of communities by recruiting, hiring, and training locally wherever possible, promoting from within and complying with international labour standards. We endeavour to work with suppliers from a reliable, ethical supply chain and provide support to communities who deserve fair and ethical businesses that they can trust.

Centurion operates robust processes to identify and manage risk across its business. Regional Management is responsible for ensuring adherence to existing processes and are actively supported by Centurion's Head of Compliance and the HSEQ function.

Centurion is committed to the implementation of a streamlined supplier approval and evaluation process. Each region maintains its own approved vendor list and understands the value in conducting due diligence relating to modern slavery and child labour, Health & Safety, Quality, Ethics, Anti-Bribery and Sanctions & Export Control on each entity or individual.

We must always remain vigilant of modern slavery, child labour, forced labour and human tracking in our supply chain and Centurion has implemented processes to identify and manage those risks. Such measures include, but are not limited to, supplier pre-qualification assessments, review of ownership structures and operational footprint, risk-based supplier categorisation, review of relevant policies, certifications, and governance arrangements and enhanced due diligence for higher-risk suppliers or jurisdictions. Embedded within Centurion's processes is ***Diligent Risk Intelligence Data (RID)***, a third-party software enhancing our supplier and customer onboarding by speeding up the diligence process, reducing paperwork and providing an automated audit trail. All Centurion supplier and customers are being continually monitored against global government sanctions, embargos, watch lists, human rights and ESG risk lists.

The automation of our diligence process means any new or emerging risks are flagged in real time. The Diligent software automatically adapts and updates to global regulatory changes to keep up with ever-changing government lists. Not only does this provide our customers with peace of mind but it also enables Centurion to make faster and better-informed decisions.

Wherever possible Centurion's suppliers are required to sign up to its standard purchase order terms and conditions or, in the case of those suppliers identified as high risk, a bespoke supplier agreement is put on place. Inclusion of appropriate labour and anti-slavery provisions are incorporated into standard terms and conditions and agreements and there is an express requirement for suppliers to comply with relevant laws Centurion's Business Ethics & Conduct Policy.

Centurion is committed to refreshing due diligence information where a material change has occurred within the supplier organisation or every 2 years, whichever comes first, and that process requires the supplier to re-certify its compliance with Centurion's Business Ethics & Conduct Policy. Centurion continually monitors and reviews the effectiveness of the relevant policies, procedures, and training that we have in place. We periodically conduct audits of a sample of the supply chain to ensure their continued suitability, including compliance with our policies.

5. ASSESSING EFFECTIVENESS

Centurion continues to strengthen and assess the effectiveness of its modern slavery risk management framework through various means, including training courses and internal communication campaigns, supplier risk assessments, monitoring training participation metrics, whistleblowing data, governance and policy reviews and ongoing evaluation of higher risk operational and supply chain activities. The Group is committed to addressing identified instances of modern slavery or exploitative labour practices appropriately and responsibly. Where concerns are identified, the Group may:

- engage with suppliers regarding corrective actions
- require remediation plan
- conduct enhanced investigations or audits
- terminate supplier relationships where necessary

At the date of this statement, Centurion has not identified any confirmed instances of modern slavery or child labour within its operations.

6. TRAINING & AWARENESS

Centurion is committed to raising awareness of modern slavery through various means, including training courses and internal communication campaigns that explain how it can identify and prevent slavery, forced labour, child labour and human trafficking, what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within Centurion, and what external help is available.

All employees are held accountable for complying with Centurion's Business Ethics & Conduct Policy and are encouraged to speak up if they have any concerns they might have about their working environment.

7. LOOKING AHEAD

Centurion recognises the importance of continuing to advance and strengthen its existing processes and infrastructure to ensure it maintains a resilient, transparent, and ethical supply chain that can quickly identify breaches of human rights and other ethical standards whilst withstanding challenging situations.

Upholding and enhancing human rights and combatting modern slavery, child labour and human trafficking form an integral part of the Centurion's ESG agenda. Everyone at Centurion has a part to play in making good decisions.



Euan Leask, CEO