

Fred. Olsen Limited

MODERN DAY SLAVERY AND HUMAN TRAFFICKING POLICY

POLICY STATEMENT

Fred. Olsen Ltd is committed to ensuring that we conduct our business in a professional and ethical manner that respects and adheres to the human rights of all employees. This extends to all companies in our group and parties included in our supply chain with whom we have an affiliation to. We expect all our suppliers to uphold the same standards and values that we do and have policies in place that demonstrate their commitment to conduct business in a responsible and ethical manner.

The Modern Slavery Act 2015 came into effect in March 2015 and is the first of its kind in Europe. The legislation enhances the support and protection for victims of human trafficking and enslavement. Fred. Olsen Ltd is wholly supportive of the Act and have the following statements to make regarding our stance:

- Fred. Olsen Ltd will not tolerate the use of forced or child labour in any of its operations.
- We do not tolerate the physical punishment, abuse or involuntary servitude of any worker.
- Our attitude to modern slavery and human trafficking is zero tolerance and we expect all those in our supply chain to comply with our values.
- If a supplier is found to be demonstrating unacceptable practices they will be investigated and provided with guidance regarding immediate required improvements.
- If no improvement is implemented or they indicate an unwillingness to cease unacceptable practices they will be reported to the appropriate authorities and ultimately trading with this supplier would cease.

Processes to Combat Trafficking and Slavery

We are committed to providing applicable staff with a salary which at least meets the National Living Wage and offering the required statutory leave entitlement. Furthermore we ensure all our staff have provided their National Insurance Number, or Working Visa if they are not British nationals, prior to their employment and perform the necessary checks to determine their eligibility to work in the UK. By checking our employees' NI numbers or Working Visa's we know they are legally eligible to work in the UK, and that their salary will be monitored by HMRC.

The Company and group's supply chain is limited and is predominantly UK, EU and US based and we would therefore expect these entities to have applicable anti-slavery and human trafficking policies and procedures. The Company will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.

Compliance

The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for the Company or under the Company's control. You are required to avoid any activity that might lead to a breach of this policy.

If you believe or suspect a breach of or conflict with this policy has occurred or may occur, you must notify your line manager or report it in accordance with the Company's Disclosures in the Public Interest Policy. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the Company's business or supply chains as soon as possible. If you are unsure about whether

a particular act, the treatment of workers or their working conditions with any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager, the Head of HR, HR Director or a Director. You can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The company is committed to ensuring no one suffers any detrimental treatment or victimization as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

The Company's zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

Breach of the policy

Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

The Company may terminate its commercial relationship with suppliers, contractors and other business partners if they are found to have been involved in modern slavery.

The Company will undertake responsibility for implementing this Policy Statement and its objectives.

Staff Training

Since the publication of the previous statement a Training Programme on Modern Slavery and Human Trafficking has been designed and delivered to all staff via presentations in Senior Management Meetings and e-learning. Over the next year we will further embed this by ensuring relevant job profiles have been updated to include responsibilities in relation to Modern Slavery and Human Trafficking.

Board Approval

This Policy Statement has been approved by the Board of Fred.Olsen Ltd who will review it annually.



Signed:

Belinda Mindell- Chief Financial Officer

Dated: April 2019