

Introduction from the CEO

We are committed to ensuring that there is no slavery or human trafficking in any part of our business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Sparrows Group for the financial year ending 31 December 2018.

Organisation's structure

Sparrows Offshore Group Limited is the parent company of the Sparrows Group¹ of companies.

We are a global provider of lifting and mechanical handling, cable and pipe lay and fluid power products and services primarily in the oil, gas and renewable sector.

Our supply chains

Our supply chains include original equipment manufacturers (OEM), fabrication services and various specialised equipment suppliers.

Our policies on slavery and human trafficking

Our policy on slavery and human trafficking, as detailed in our Business Ethics Policy, 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 chains.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we regularly conduct vetting and compliance checks.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our ethics we require our suppliers and contractors to either accept and adhere to our Business Ethics Policy or to agree with the principals of the policy.

Communication

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, our staff are required to certify their compliance with our Business Ethics Policy on an annual basis.

¹ Sparrows Offshore Group Limited, Hawk Finco Limited, Hawk Newco Limited, Hawk Noteco Limited, Hawk Debtco Limited, Hawk Holdco Limited, Energy Cranes International Limited, Hawk Bidco (US) Inc., ArranCo 3 Limited, ArranCo US LLC, ArranCo 4 Limited, Sparrows Offshore LLC, Sparrows Offshore International Group Limited, Servtech UK Limited, Sparrows Global Resources Pte Limited, Sparrows Offshore Services Limited, Sparrows Angola Limited, Sparrows India 1 Limited, Sparrows India 2 Limited, Servtech Limited, Sparrows Offshore Services India Private Limited, Sparrows Holdings Australia Pty Limited, Sparrows Services Australia Pty Limited, Sparrows Offshore Services (Singapore) Pte Limited, PT Sparrows Offshore, PT Sparrows Services Batam, Sparrows FZE, Sparrows Saudi Arabia LLC, Sparrows Denmark Aps, Alpha Offshore Service A/S, Sparrows BSM Engenharia Ltda, Hawk Engineering Lifting Solutions Lda and SS AO Lifting Solutions Lda.

Sparrows Group
Slavery and Human Trafficking Statement



Further steps

Following a review of the effectiveness of the steps we have taken in 2018 to ensure that there is no slavery or human trafficking in our supply chains, we intend to include provisions within our standard terms and conditions of purchase requiring compliance with the Modern Slavery Act 2015.

This statement was approved by the board of directors of Sparrows Offshore Group Limited on 26 March 2019.

A handwritten signature in blue ink, appearing to read "Stewart Mitchell", is positioned above a horizontal line.

Stewart Mitchell
Chief Executive Officer
Date: 26 March 2019