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 2019.

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 principles 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.

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Further steps
We have included express provisions within our standard terms and conditions of purchase requiring compliance with the Modern Slavery Act 2015. We remain committed to monitoring and enforcing our systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

This statement was approved by the board of directors of Sparrows Offshore Group Limited on 22 April 2020.

Stewart Mitchell
Chief Executive Officer
Date: 22 April 2020