Modern Slavery Statement

Here are the steps that **ersg** has taken and continue to take to understand and minimise the potential risk of modern slavery in its business and supply chains.

This statement is published in line with s. 54 (1) of the Modern Slavery Act 2015.

About ersg

ersg Holdings Ltd and its subsidiaries ("**ersg**") is a global specialist energy recruitment company operating from 13 offices across 12 countries. We place highly skilled professionals into the energy sector on a Contract, Permanent and a Fixed Term Contract Basis. We pride ourselves on sourcing the best staff for our clients based in the UK, Europe, USA and beyond. Over the years we have developed an expertise across a range of areas such as Onshore & Offshore Wind Energy, I.T. & Digital, Oil, Gas & Power, Built Environment, Transmission & Distribution and Subsea & Marine.

Our commitment to the principles of the Modern Slavery Act 2015

At **ersg** we are committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer we're committed to creating and ensuring a non-discriminatory recruitment and working environment for our internal staff and our temporary workers and contractors. achieving the highest standards in the conduct of our business and activities worldwide.

We primarily work with suppliers, contractors and clients that are not usually considered to be at a high risk of modern slavery, but we recognise the risk and continuously uphold our zero-tolerance policy of slavery or human trafficking in any part of our own business or in any of our supply chains. We expect all who have, or seek to have, a business relationship with **ersg** to comply themselves with this statement and to act at all times in a way which is consistent with our anti-slavery policies and values.

Our Supply Chain

Our supply chain supports **ersg** to work as a global recruitment company. We work with a range of suppliers, clients and contractors to provide individuals with work-finding services as an employment agency and business as defined in section 13 (1) & 13(2) of the Employment Agencies Act 1973 and supply those individuals to our clients .

As part of our culture of good ethics and practice **ersg** operates a set of values which reflect our relationships with our principal stakeholders: customers, shareholders, suppliers, contractors and employees. In all of its business dealings, **ersg** opposes the exploitation of individuals in any form, particularly the offences created by the Modern Slavery Act 2015 and is committed to preventing it by whatever means possible. **ersg** expects the same of all who work for and with it.

We periodically access our supply chain and conduct risk assessments. We expect high standards of ethical behaviour from all of our stakeholders. We updated our processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We also expect our suppliers to hold their own suppliers to the same requirements.

Our policies

The following policies are available to all staff:

- Anti-bribery and corruption
- Equal opportunities and diversity
- Ethics
- Whistleblowing

Steps for the prevention of modern slavery

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors and suppliers. Our processes include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We expect our suppliers to hold their own suppliers to the same requirements.

All employees and other stakeholders are required to comply with **ersg's** procedures to prevent modern slavery and to conduct business in a manner such that modern slavery is prevented. They are provided with awareness training and informed about how to take action if they suspect modern slavery.

ersg complies with the Modern Slavery Act 2015, but it acknowledges that it does not control the conduct of those in our supply chains. To underpin our compliance with practical steps, **ersg** have implemented the following measures:

- conduct periodic risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can and are, focused on those areas;

- engage with our suppliers both to convey to them our anti-slavery policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;

- conduct supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;

- include contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) business relationships, both routinely and at times of reasonable suspicion; and

- conduct a full compliance check on the contractors and the personal service companies (PSC) with whom we engage.

From financial year 2016, **ersg** has included in the directors' report accompanying its annual financial statements a reference to its Modern Slavery Statement which is present on our website.

Responsibility for the policy

Responsibility for the prevention of modern slavery rests with **ersg**'s directors and senior management. The board of directors of **ersg** has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

Managers are responsible for ensuring that their staff understand and comply with this policy and are given routine training on it.

Actions to report modern slavery or human trafficking

Ersg's Whistleblowing Policy provides guidance on how concerns can be communicated to us. It applies to all employees and states that concerns about suspected modern slavery associated with **ersg** or our stakeholders may be reported by employees to a director, their manager or the Whistleblowing Officer.

Concerns should be raised if any employee:

- suspects a person acting on behalf of **ersg** is seeking to exploit another in a way which could amount to modern slavery;
- suspects that a person acting on behalf of one of **ersg's** suppliers is seeking to exploit another in a way which could amount to modern slavery;
- has received an approach from a person acting on behalf of **ersg** who has invited the participation in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- has information which leads to the reasonable conclusion that a person acting on behalf of **ersg** or any supplier is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports are kept confidential except where **ersg** is required to pass information to relevant authorities. **ersg** ensures full compliance in working with the relevant authorities to assist in the prevention of Modern Slavery.

Safeguards

We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. **ersg** will accept and take seriously any concerns, including those that are communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken.

Training and further steps

ersg provides training as part of onboarding new employees and is implementing a frequent training process for existing staff as a refresher, once per year.

Communication and awareness of this policy

We aim to communicate our zero-tolerance approach to modern slavery to all stakeholders at the outset of our business relationship with them and to reinforce it as appropriate thereafter.

Review

This Modern Slavery Statement is approved by **ersg's** directors, for the financial year ending 31 December 2022. It is reviewed on an annual basis and is updated in accordance with any amendments and additions to the Modern Slavery Act 2015.



Signed by Michael James Ryan
Position: CEO
Dated: 17 May 2024
On behalf of **ERSG** Holdings Ltd and its subsidiaries