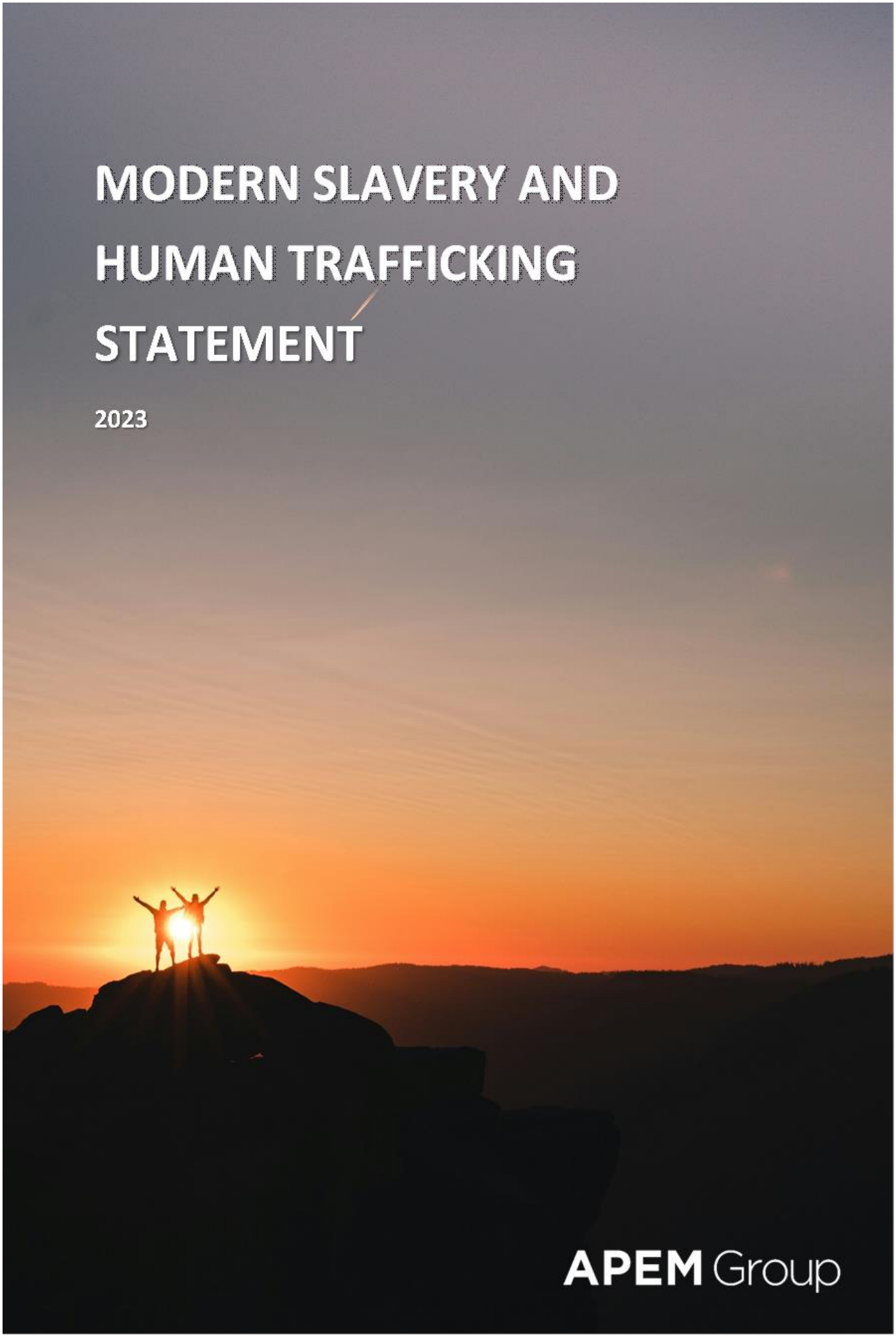
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

2023



APEM Group

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1. APEM Group structure, operations and supply chain

1.1. Organisational structure



















With locations across the globe, APEM Group provide independent environmental consultancy and expert scientific advice to a wide range of industries including water, renewables, infrastructure, power and utilities, ports and harbours as well as to regulators and governments around the world.

We provide a range of services to clients including our world leading digital aerial wildlife surveys, environmental impact assessments, marine, water & terrestrial ecology, geospatial insights, shipping and navigational risk assessments and landscape visualisation.

Since 2021, the APEM Group have made a number of acquisitions:

- Woodrow, an environmental and sustainability consultancy based in County Sligo, Ireland in July 2021.
- AQUAFACT, a specialist in marine surveys, based in Galway, Ireland in February 2022.
- GoBe Consultants, a planning and environmental services consultancy, based in Devon and Glasgow, in July 2022.
- Macroworks, a provider of landscape and visual consulting services based in Dublin, Ireland June 2023
- NASH Maritime, a specialist in shipping, navigation and maritime risk consultancy, based in Southampton, in July 2023
- Aspect Ecology, planning and development in terrestrial environments, based in Oxfordshire, in October 2023

1.2. Group sector structure

APEM Group is comprised of two technical sectors: Marine Science and Development and Water and Land Environmental Services supported by Business Support and Environmental Data Solutions.

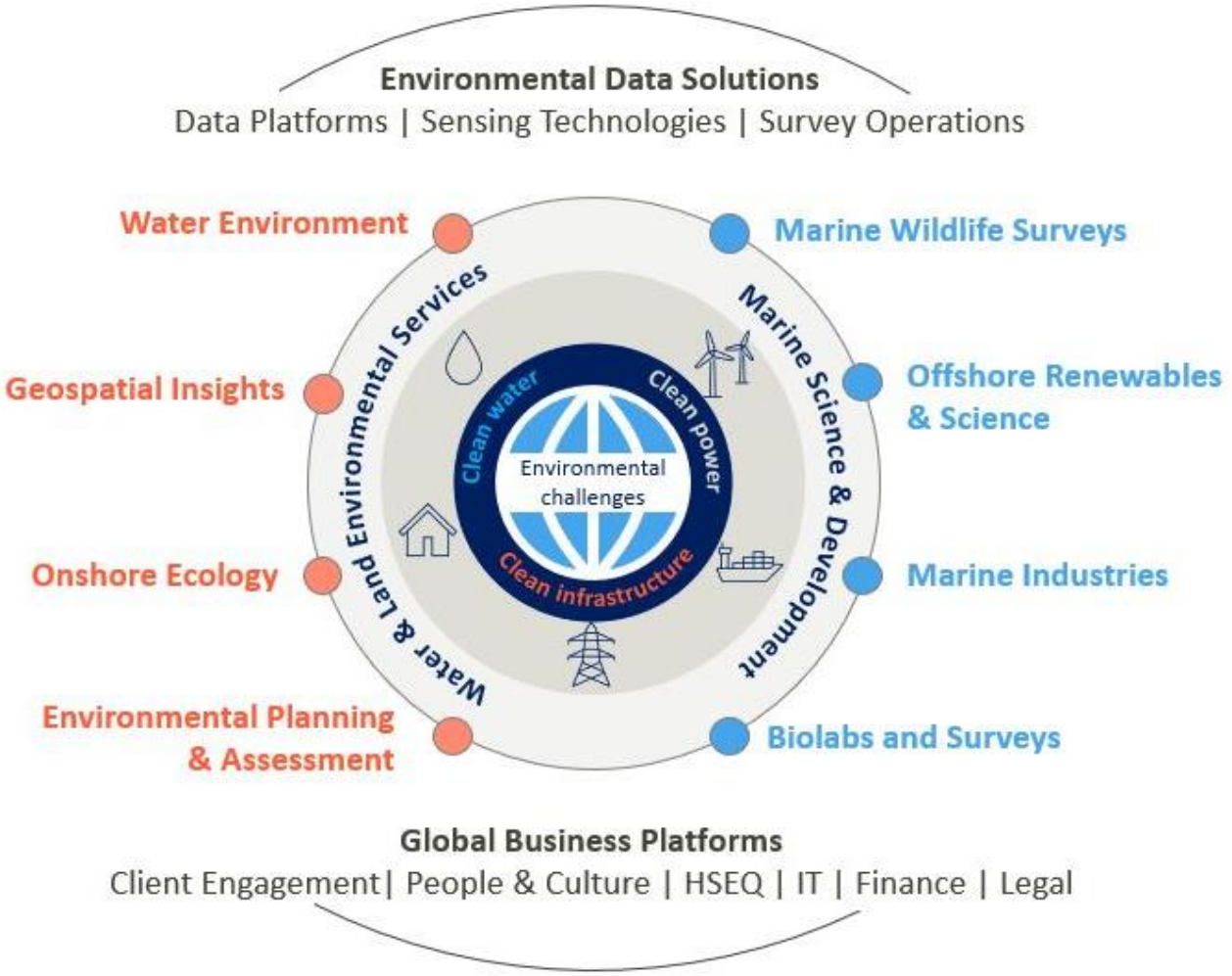


Figure 1 APEM Group sector structure

1.3. Supply chains

We recognise that our supply chains extend globally, and we are dedicated to ensuring that our suppliers and business partners share our commitment to prevent modern slavery through ethical practices and human rights. We use a selection of reputable suppliers that undergo vetting and auditing as part of our due diligence processes.

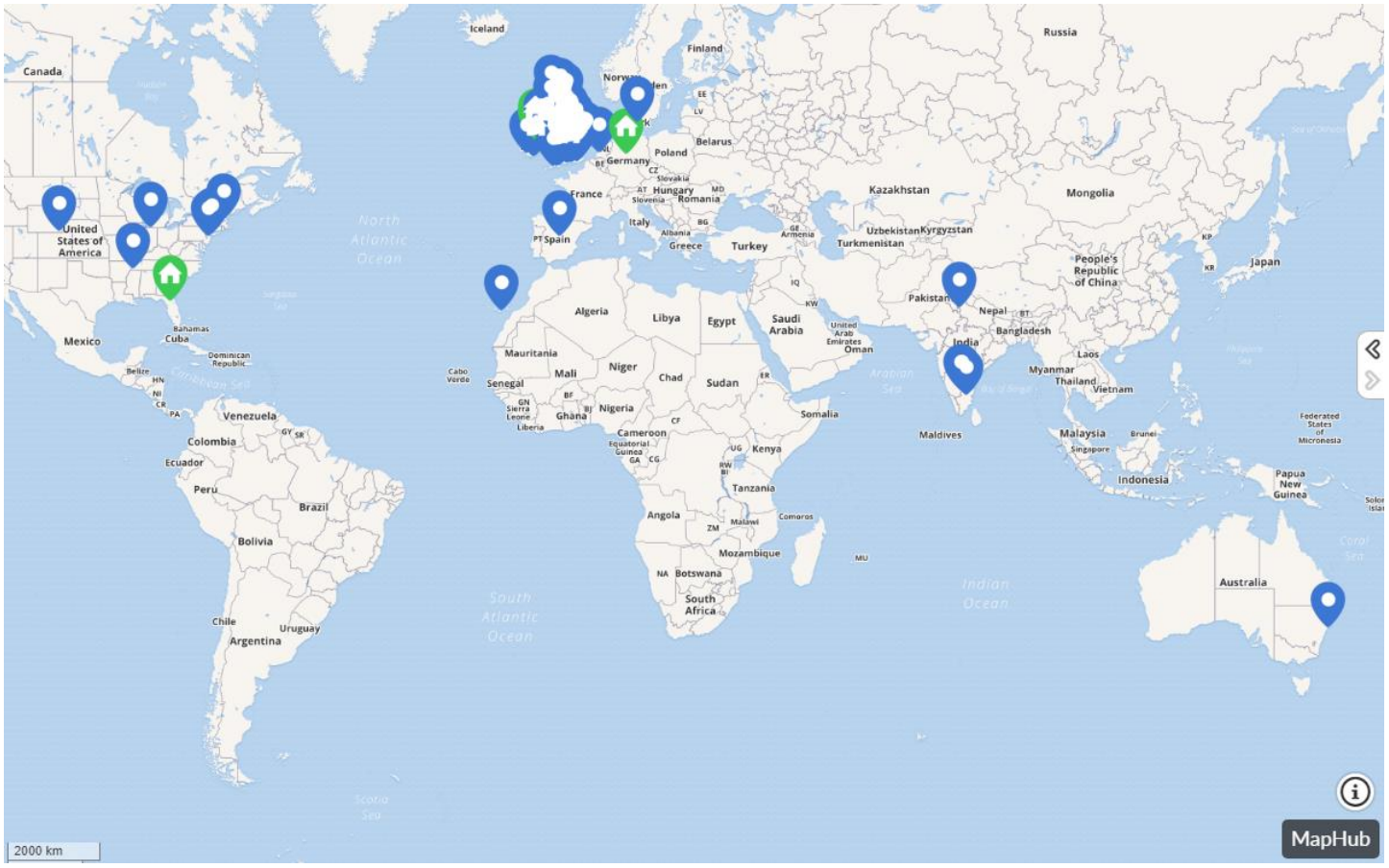


Figure 2 Map of some APEM Group approved suppliers and their geographical locations

2. Policies in relation to slavery and human trafficking

2.1. APEM Group Modern Slavery Policy

APEM Group are committed to preventing modern slavery practices in our operations and supply chain to ensure that we are supporting global efforts to improve the lives of all people on this planet. Our policies outline the standards we aim to maintain to prevent modern slavery risks within our operations and procurement practices, and ensure that our stakeholders comply with the same rigorous standards.

This annual Modern Slavery Statement highlights our ongoing efforts to address any risks and promote ethical practices, promote human rights and ensure that slavery and forced labour have no place in our business activities.

Our Modern Slavery Policy is also supported by the following policies on:

- Ethics
- Whistleblowing
- Ethical Procurement
- Anti-Bribery and Corruption

Our corporate standards documented in the suite of policies, handbooks, and terms and conditions set out clear expectations regarding labour standards, fair wages, working conditions and the prohibition of forced labour or human tracking. We expect our stakeholders to adhere to these standards, and we communicate our expectations during employee induction and supplier onboarding processes.



3. Due diligence processes

3.1. Human Resources

Within the APEM Group we are committed to upholding the highest standards of ethical conduct and human rights throughout our operations. We recognise that modern slavery and human trafficking are abhorrent practices that have no place in our organisation.

We commit to creating a workplace free from any form of forced labour, human trafficking, or exploitation. We adhere to all applicable labour laws and regulations, guaranteeing fair pay, working hours, and safe working conditions for our employees. We have a zero-tolerance approach towards modern slavery, extending to all levels of our organisation, including contractors, subcontractors, and third-party suppliers.

Additionally, we provide comprehensive training to our People team, equipping them with the knowledge and skills to identify potential indicators of modern slavery within our workforce. We maintain open lines of communication, empowering employees to report any concerns or suspicions without fear of reprisal.

3.2. Procurement

Procurement practices, manufacturing and supply of goods and services performed by suppliers and vendors can have some of the most significant implications on human rights. We are committed to identifying and managing these risks by conducting due diligence activities such as audits, engaging with suppliers and communicating our expectations.

All employees involved in procurement activities must comply with our Modern Slavery Policy whether these are internal to APEM Group or a part of our supply chain partners operating as an extension of our business. Our commitment to eradicating modern slavery in all its forms must be embedded in all procurement activities. Steps are taken to ensure the suppliers we engage with adhere to the same standards as APEM Group. The senior leadership team are committed to implementing these standards.

3.2.1. Supplier evaluation

Prior to undertaking any work, our suppliers undergo an evaluation which includes an assessment of their policies and commitment to human rights.

3.2.2. Audits

We shall conduct audits or assessments of suppliers deemed as high risk to ensure compliance with our standards. These audits are conducted by professionally trained auditors.

3.2.3. Corrective actions

Should non-compliance or potential risks be identified, we shall work collaboratively with our suppliers to address issues and implement corrective actions.

3.2.4. Continuous monitoring and improvement

We shall continually monitor and review our performance in preventing modern slavery and human trafficking to measure progress and identify areas for improvement.

4. Risk assessment and management

4.1. Recruitment

A comprehensive recruitment process is part of our commitment to combating modern slavery. This process ensures that our recruitment is fair, transparent, and free from any form of exploitation.

We strictly prohibit the use of forced labour, debt bondage, or any other practices that infringe upon the rights and dignity of individuals seeking employment. We carefully select and engage with reputable recruitment agencies and partners who share our commitment to ethical practices. We conduct thorough due diligence on these agencies and monitor their compliance to ensure they adhere to our strict standards.

Our recruitment process also includes measures to prevent the charging of recruitment fees to candidates, protecting them from potential debt bondage.

We provide ongoing training and awareness programs to our People team and hiring managers to ensure they are well-informed and equipped to identify and address any indicators of modern slavery during the recruitment process.

We encourage all employees to report any concerns or suspicions related to modern slavery, and we guarantee that appropriate action will be taken in a confidential and supportive manner. Through our recruitment processes, we are dedicated to fostering a safe and inclusive work environment for all individuals associated with our organisation.

4.2. Supply chain

To assess the risk of modern slavery within our supply chain, APEM Group conduct a comprehensive vetting process to identify any potential risks related to modern slavery practices.

We are committed to engaging with suppliers who share our commitment to human rights and who can provide safe and fair working conditions. We will only engage suppliers who have passed our due diligence process, targeting the prevention of modern slavery practices and other human rights abuses.

5. Monitoring

In case a violation of our Modern Slavery Policy occurs, APEM Group commit to responding swiftly and taking necessary action based on the gravity of the violation. Collaboration and support will be expected to support any investigations and necessary action will be taken as per the outcome of the investigation.

To date, we have had no incidents in relation to modern slavery, but we are committed to the prevention of modern slavery in our operations and beyond. We will identify and address occurrences of modern slavery and human trafficking in our processes and supply chains and uphold the highest human rights standards.



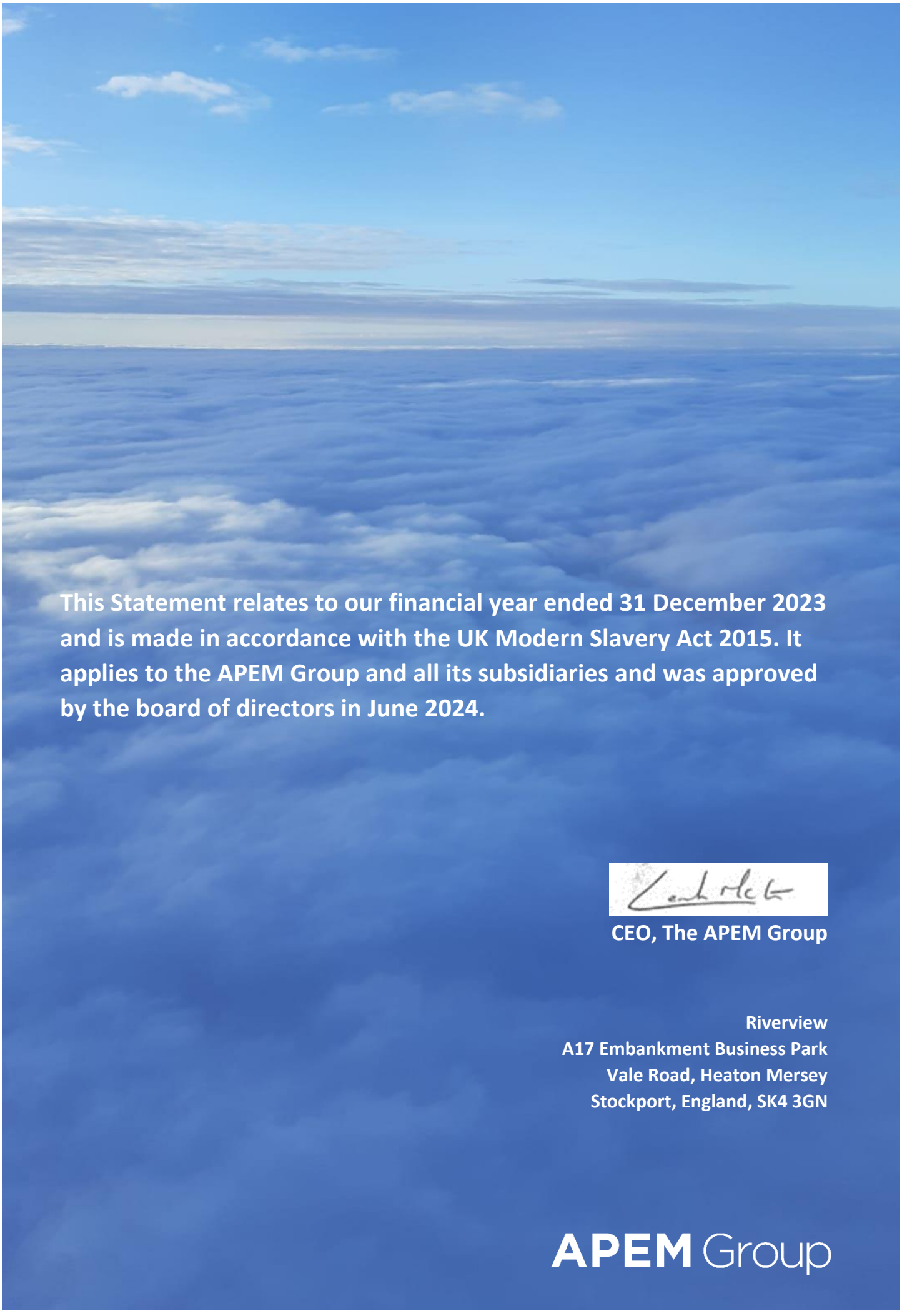
6. Training on modern slavery and trafficking

We are committed to providing training and support to both staff and suppliers to identify and prevent modern slavery practices from our recruitment processes and within our supply chain.

APEM Group will communicate our expectations to our suppliers. Contractual templates feature clauses that require suppliers to comply with our modern slavery policy. Additionally, we will continue a two-way conversation with our suppliers providing the necessary support and training for identifying and preventing modern slavery practices if required.

APEM Group will ensure that our employees are fully aware of our modern slavery policies and procedures. We will also provide training to suppliers to increase their understanding of the importance of compliance with our Modern Slavery Policy where required.





This Statement relates to our financial year ended 31 December 2023 and is made in accordance with the UK Modern Slavery Act 2015. It applies to the APEM Group and all its subsidiaries and was approved by the board of directors in June 2024.

CEO, The APEM Group

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