Modern Slavery Statement (Group)

Introduction

This statement sets out Orion Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year ending December 2022.

As part of recruitment industry/sector, the Orion Group recognises that it has a responsibility to take a robust approach to slavery and human trafficking with a zero tolerance policy prohibiting trafficking in persons. The Orion Group is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure, Our Business and Supply Chains

This statement covers the activities for the Orion Group and its ultimate parent company Orion Engineering Services Limited. The following UK business entities also form part of the Orion Group:

Orion Rail Construction Services Ltd
Orion Commissioning and Completions Management Services Ltd

Orion Group has over 200 employees worldwide, supplying recruitment services and managing placements of over 3,500 workers/contractors every year via our worldwide network of offices throughout Europe, the Americas, the Middle East, Asia Pacific and Africa. The Orion Group is also a member of the Recruitment and Employment Confederation (REC).

Providing specialist recruitment services across a range of sectors including Accountancy & Finance, Construction and Property, Commissioning, Energy, Oil and Gas, Engineering and Manufacturing, Executive, Life Sciences, Office Professionals, Purchasing, Rail, Renewables and Telecoms. The Orion Group have the market intelligence and the experience necessary to take a holistic approach to project delivery – managing contracting services from start to finish.

Our supply chains include but are not limited, sourcing of candidates for clients. This may involve the introduction by external agencies to the Orion Group for onward supply to our clients. We expect our suppliers and potential suppliers to aim for high ethical standards and to operate in an ethical, legally compliant and professional manner by adhering to our Supplier Code of Conduct. We also expect our suppliers to promote similar standards in their own supply chain.

The Orion Group takes its responsibility to be alerted to risks seriously and staff are expected to report concerns, no matter how small, in line with policies and procedures in place.

Assessment of Risk

The Orion Group assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking. In doing so consideration is given to the services/products provided over the duration of the contract and the supply chain involved. Consideration is also given to the suppliers' current activity reviewing their website, codes of conduct and as appropriate sourcing policies in terms of having:

- A code of conduct that addresses slavery.
- Sourcing policies that address slavery
- Demonstrable management processes in place to manage the risk of slavery in their supply chain.
- Been identified in the media or through organisations that monitor risk as having instances of slavery.

For suppliers of goods or services that are not for resale, the Group will assess the risk in relation to each sector and carry out desktop reviews or conduct face to face meeting and reviews with those suppliers to ensure they are effectively manage the risk in the business.

Responsibilities

Responsibilities for the Orion Group's anti-slavery initiatives are as follows:

- **Policies:** The Human Resources and Business Management Systems departments are responsible for ensuring Group policies are up to date and reflective of the Modern Slavery Statement (Group).
- **Risk assessments:** In accordance with the Orion Group Business Management System and as appropriate the Group undertakes risk assessments in relation to activities undertaken and suppliers.
- **Investigations/due diligence:** The Group Commercial and Compliance Departments in conjunction with Regional Directors and Country Managers are responsible (Within Regional/Country responsibilities) for investigations and ensuring due diligence is undertaken in respect of slavery and human trafficking.
- **Awareness raising:** The Group Commercial and Compliance Departments, Regional Directors and Country Managers will receive awareness notifications in respect of their responsibilities regarding slavery and human trafficking in the supply of services and in receipt of services from suppliers.

Relevant policies

Within the Orion Group Standards of Business Conduct the following policies that outline the company position and its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** The Orion Group encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Orion Groups whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Standards of Business Conduct:** The Orion Groups code makes clear to employees the actions and behaviour expected of them when representing the Group. The Orion Group strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Other relevant policies:** Orion has other relevant policies to which they can refer, for example a Corporate Social Responsibility policy, contained within the Standards of Business Conduct and the Business Management System which are also considerate of slavery and human trafficking risks.

Supplier Code of Conduct

It's the expectation of the Orion Group that our suppliers will apply ethical standards of doing business. These standards (without limitation) are likely to include:

- Refrain from holding a person in slavery or servitude or requiring any person to perform any form of forced or compulsory labour.
- Not arrange or facilitate the trafficking of any persons.
- Not purchase materials or services from companies who use involuntary labour or participate in human trafficking.
- Treat and reward employees equally on the basis of the characteristics of their work and the intensity of their effort.
- Provide, whilst taking into account the specific dangers of the relevant sector for safe, hygienic and healthy working environments for all their employees.
- Provide, as a minimum, rates of pay at the national legal standards; and
- Act in accordance with the applicable national and regional laws and regulations at all times.

Due diligence

The Orion Group undertakes due diligence when considering providing workers to clients and in working with clients, taking on new suppliers, and reviewing its existing suppliers as appropriate. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier.
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- as appropriate conducting random supplier audits / assessments on slavery and human trafficking where higher risks are identified;
- reviewing an annual risk profile for each supplier.

Training/Awareness-raising programme

Communication of Group policies and procedures is facilitated by either email, briefings, presentations or classroom training as appropriate. Specifically, awareness in respect of Groups position on modern slavery issues is communicated at induction and as part of an annual refresher.

This statement has been approved by the Orion Group Board of Management who review and approve the statement annually.



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