



## **Modern slavery statement for 2018**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and it constitutes Heerema Fabrication Group's (HFG) statement for the financial year 2018. This statement sets out the steps that HFG has taken in order to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

### Our commitment

As stated in HFG's Code of Conduct, we are committed to respecting all internationally recognised human rights. We will conduct our business with integrity and transparency and in a way consistent with the UN Guiding Principles on Business and Human Rights. HFG has a zero tolerance approach to any form of slavery, servitude, human trafficking and forced labour.

### Our business

Heerema Fabrication Group (HFG) specializes in the engineering and fabrication of large and complex structures for the offshore oil & gas and energy-related industries. HFG offers a comprehensive range of services, including initial conception, front-end engineering, detailed fabrication design, procurement, construction and commissioning. With three large fabrication facilities located around the North Sea, a workshop facility in Poland and a multi-disciplined engineering company in the Netherlands, HFG has facilities to design and build large constructions in controlled conditions.

### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- HFG's Code of Conduct, available at <https://hfg.heerema.com/about/responsibility/>. The code explains how we behave as an organisation and how we expect our employees and suppliers to act.
- Whistle-blower policy. We have in place a whistle-blower policy so that all employees know that they can raise concerns about how they or their colleagues are being treated, or about practices within our business or supply chain, without fear of retaliation.
- Internal investigations policy. The policy sets out the way HFG deals with any reported breaches of our Code of Conduct and policies.

### Measures to safeguard against modern slavery

- HFG operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on suppliers before allowing them to become a preferred supplier.
- We work only with a number of pre-approved, reputable agencies for the selection of hired-in personnel.
- Our Code of Conduct forms part of our contract with suppliers and they are required to confirm that no part of their business operations contradicts it.
- We have incorporated specific contractual obligation to the contracts with our suppliers, to take all reasonable measures in order to ensure that a violation of human rights is not taking place within their business, alongside the contractual obligations on other regulatory compliance topics.



- All employees work on the basis of a written contract, drafted in a language they understand which details all their conditions of employment including their salary, working hours and vacation days.

#### Training

Classroom trainings were given to HFG's new employees about HFG's Code of Conduct and compliance policies.

#### Our performance indicators

Our monitoring activities do not lead to any non-conformances;

No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

J.J. van Brouwershaven  
CEO

P.B.L. Huisman  
CFO

Date: 07 February 2019