

### Introduction

We are a specialist service company delivering integrated solutions for complex energy and infrastructure projects, combining experts, equipment, intellectual property, and technology across the entire asset lifecycle.

With 3,000 experts globally, the EnerMech Group of companies operates across Europe, Asia, Australia, Africa, North America, the Middle East, and the Caspian. As a global business, we recognize our responsibility to prevent modern slavery and human trafficking in our operations and supply chain. We continue to welcome and embrace the requirements of Section 54 of the UK Modern Slavery Act 2015.

The International Labor Organization (ILO) estimates that 50 million people worldwide are subject to modern slavery, with 1.5 million in developed economies. EnerMech remains committed to a zero-tolerance approach towards any form of modern slavery and human trafficking, whether within our company or our supply chain. We expect the same from our business partners and suppliers.

This statement is prepared and published on behalf of EnerMech Group and its UK subsidiaries<sup>1</sup> in accordance with the Act for the financial year ending 2024.

### Company Structure and Business Changes

In March 2024, EnerMech underwent an ownership transition, with the Carlyle Group Inc. exiting and ownership transferring to three private equity investors.

There have also been significant leadership changes:

- Charles "Chuck" Davison Jr. was appointed as CEO in March 2024, replacing Christian Brown.
- Tyson D'Souza was appointed as CFO in October 2024, having joined EnerMech as Group Financial Controller in July of the same year.
- Paul Kearney was appointed Chief Legal & Compliance Officer, and has overall responsibility for Legal & Compliance, including the Modern Slavery program.

In December 2024, we implemented a new operating model, transitioning from a regional service structure to a business-line-focused structure. The four core business lines are:

- Lifting Solutions
- Energy Solutions
- Infrastructure & Industrial Solutions
- Geographies

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<sup>1</sup> EnerMech International Limited, EnerMech Holdings Limited, EnerMech Limited, EnerMech UAE Limited (UK), EnerMech Services Limited and Minteg Limited. Dormant entities include A1 Safety Training Consultants Ltd, Specialist Training & Maintenance Limited, Specialist Maintenance Services (Holdings) Ltd, Norson Hydraulic Services Ltd, Norson Power Ltd, Total Reclaim Systems Ltd, Norson Engineering Ltd, Norson Group Ltd, Norson Holdings Ltd and Rescom Technology Ltd.

Each business line has a global leader responsible for operations.

Additionally, our company values were updated in 2024 to:

- Transparency
- Passion
- Collaboration
- Innovation

As part of our transformation, EnerMech underwent a rebrand in December 2024, introducing a new logo and the slogan "Energizing Energy."

### Supply Chains

EnerMech operates a global supply chain, comprising local, national, and international suppliers. Our supply chain includes original equipment manufacturers (OEMs), specialized equipment suppliers, and service providers across multiple disciplines, including Training, Hydraulics, Equipment Rental, Maintenance, Mechanical, Electrical & Instrumentation, Process & Pipeline, Commissioning, Integrity Management, Pipeline & Subsea, and Cranes & Lifting.

While EnerMech is generally not a manufacturer and does not rely heavily on raw materials, we ensure that all materials (such as bar and plate metals) are sourced from UK distributors compliant with EN 10204 standards.

Our supplier onboarding and due diligence process remains unchanged. All suppliers must:

- Be approved vendors before engagement.
- Complete a Business Partner and Supplier Evaluation Questionnaire, which includes questions on Modern Slavery risks.
- Adhere to Anti-Slavery provisions in our Global Terms & Conditions.
- Confirm compliance with the EnerMech Code of Business Conduct and the Supplier Code of Business Conduct.

These measures are monitored through the Vendor Evaluation process to ensure compliance and accountability.

### Compliance and Prevention

#### Policies and Governance

EnerMech maintains a comprehensive compliance program designed to prevent modern slavery and human trafficking. This includes:

- The Code of Business Conduct – Applies to all employees, directors, joint venture partners, agents, and contractors. The Code of Business Conduct was updated in March 2025 and is available to all employees and third parties as required.

# POLICY STATEMENT

## Modern Slavery and Human Trafficking



- The Modern Slavery and Human Trafficking Policy – Outlines our commitment to preventing modern slavery and provides employees with guidance on identifying and reporting concerns.
- The Supplier Code of Business Conduct – Ensures suppliers uphold legal and ethical employment standards, prohibiting forced labor and human trafficking.

### **Governance Structure**

EnerMech established an Environmental, Social & Governance (ESG) Committee in 2021. The ESG Committee's specific role in overseeing Modern Slavery compliance is under review.

The Committee focuses on human rights, labor practices, and business ethics as part of the company's broader ESG agenda. Regional ESG teams help cascade compliance measures and ensure engagement across the business.

### **Speaking Up and Reporting**

We encourage all employees to report any concerns related to modern slavery. Our Speaking Up Policy provides a confidential mechanism for employees to raise issues without fear of retaliation.

The Speaking Up Policy was last reviewed in April 2025 and remains available to all employees via the company's document register.

In addition to the Speaking Up Policy, EnerMech partnered with SpeakUp in Q1 2025. SpeakUp offers a secure channel for those wishing to report potential ethical concerns safely and anonymously. The introduction of SpeakUp highlights EnerMech's commitment to ensuring a safe and transparent workplace environment for all.

### **Training and Awareness**

EnerMech is committed to ensuring that all employees have a clear understanding of modern slavery risks and how to prevent them.

Previously, we committed to rolling out a standalone eLearning module on Modern Slavery & Human Trafficking, initially targeting Supply Chain and Business Development teams and those employees listed in the Company Authority Matrix.

We have now successfully launched a Modern Slavery training program to help our people in spotting, preventing and reporting modern slavery and human trafficking, making it widely available across the organization via our Learning Management System. This training provides practical guidance on identifying and addressing modern slavery risks within our operations and supply chain.

# POLICY STATEMENT

## Modern Slavery and Human Trafficking



Recognizing that not all employees have routine access to online learning, we continue to explore additional ways to ensure awareness and engagement on this critical topic across our workforce.

In addition, Modern Slavery compliance is reinforced through regular Compliance Bulletins, which highlight key risks and mitigation steps.

### **Risk Management**

EnerMech continues to assess modern slavery risks within our supply chain using external risk indicators such as the Corruption Perceptions Index (CPI).

Our supplier risk assessment methodology has not changed, and we remain focused on high-risk regions where modern slavery and human trafficking are more prevalent.

### **Investigations and Findings**

EnerMech has not identified any cases of modern slavery within its operations or supply chain in the past two years.

If any concerns arise, they will be investigated promptly in line with our Speaking Up Policy and compliance procedures.

## **Our Goals for 2025**

Looking ahead, we are committed to:

1. Ensuring stronger alignment in supplier onboarding practices across all business lines.
2. Reviewing and updating the Modern Slavery Policy and Supplier Code of Business Conduct as required.
3. Clarifying governance oversight for Modern Slavery within the company's ESG framework.

## **Approval & Publication**

This statement has been approved by the Board of Directors of EnerMech and signed by:

**Charles "Chuck" Davison Jr.**  
**Chief Executive Officer**