

Modern Slavery Statement 2020



Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps that Swellfix UK Limited ("Tendeka") have taken during the year ending 31 December 2019, to ensure that slavery and human trafficking are not taking place in our supply chains and in any part of our business. Tendeka are committed to conducting business in an ethical and sustainable manner which preserves and respects human dignity, complying with all applicable laws and regulations. We undertake practicable steps, including training and due diligence, to ensure that our core values are implemented across all aspects of our operations. In this document we describe our business and supply chain, explain the steps we have taken to mitigate any risks of slavery or human trafficking, and how we plan to improve those steps in consideration of the Modern Slavery Act 2015 requirements.



Tendeka Business

Tendeka have vast experience developing completion solutions for Oil and Gas companies across the globe. With bases strategically situated around the world, we are proud to provide our clients with the strength and resources of a global organisation, with speed and flexibility to create the customer focus of a local organisation. We provide high quality completion and well services, and significantly improve well performance through utilisation of global footprint and extension routes to market. Our vision is to optimise every drop of energy produced from the market.



Due Diligence and our Supply Chain

Tendeka recognise that the challenge of ensuring modern slavery is not committed throughout our supply chain is not only to communicate clearly but also to anticipate, identify, control and manage any such risks and impacts. Therefore, we have proportionate controls and mechanisms in all stages of our operations cycle.



Policy Framework and Controls

Understanding and addressing potential modern slavery issues is a matter of priority for Tendeka. It is of the utmost importance that we have an internal commitment to the protection of human rights and to fair and ethical practices. The Company has a zero-tolerance approach to modern slavery in our organisation and supply chain. The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Respect for human rights and remedies for non-compliance are ways in which we uphold Tendeka's Business Principles.



Training

All employees are required to complete ethics and compliance training, this includes information contained within Tendeka's Code of Conduct and their obligations regarding applicable laws and regulations. This training is refreshed every two years and employees are required to sign a declaration confirming that they have read, and will abide by, the Code of Conduct. The Code details compliance issues and explicitly addresses modern slavery. In 2019 we created a new e-learning module, specifically aimed at modern slavery, that all employees are required to complete.



Relationships with our Customers and Suppliers

We are committed to engaging with our stakeholders, customers, and suppliers to address the risk of modern slavery in our operations and supply chain. It is a condition of all customer, supply and vendor contracts entered into with Tendeka that principles set out within our Code of Conduct are adhered to.

Tendeka have reviewed and enhanced all vendor evaluation forms to include provisions on modern slavery. This ensures all new vendors are aware of our stance on modern slavery and explicitly confirm that they take steps to mitigate the risk of modern slavery within their own supply chain.



Code of Conduct

The Code of Conduct forms the backbone of Tendeka's policy and ethical framework. We understand that we have a responsibility to conduct our business ethically and that this extends to our customers, contractors and suppliers. Our Code of Conduct is made internally and externally available to ensure all aspects of our business conduct is being carried out to the highest standards, whilst remaining in compliance to all applicable laws and regulations.

This Code clearly states that Tendeka has a zero-tolerance to modern slavery and that we will not knowingly accept business with any organisation that makes use of slavery or human trafficking. The values contained within our Code of Conduct underpin our

business and the way in which we operate, and we consider these values to be wholly within our obligations under the Modern Slavery Act 2015.

Whistleblowing Policy

Tendeka have a Whistleblowing Policy which is applicable to all Tendeka employees, contractors, and consultants. We expect our employees to deliver their work with honesty and integrity and believe it is important to harness a culture whereby employees can report any conduct which they believe may be illegal or unethical. All concerns are dealt with in the strictest confidence and are investigated with respect.



Closing Statement

Our commitments for 2020 and beyond:

In 2020, we will continue to embed our values into all aspects of our business, ensuring all employees understand the potential risks of modern slavery and are aware of how to identify and address areas of concern.

Further commitments include:

- continued enhancement of our due diligence process in high risk areas;
- continued review of supply chain assessments, to ensure they are fit-for-purpose;
- refreshing due diligence on existing vendors with specific reference to modern slavery obligations; and
- reviewing and updating of general terms and conditions, to include specific reference to modern slavery obligations.

This statement was approved by the Board of Directors of Swellfix UK Limited, upon recognition of the Modern Slavery Act 2015. This statement covers the year ending 31 December 2019 and will therefore, be reviewed and republished March 2021.

Alan Pearson

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Director 01 March 2020