



Modern Slavery Statement

This statement sets out the commitment of Fairfield Energy Limited, its subsidiary Fairfield Betula Limited and its parent company Decom Energy Limited, to recognising the potential risks and putting in place the necessary steps to combat all forms of 'Modern Slavery', defined as slavery, servitude, forced or compulsory labour and human trafficking, in either our own business or that of our supply chain in line with section 54 of the Modern Slavery Act 2015.

Our Business

Fairfield Energy is a long-established and experienced UK based operator that is building expertise in North Sea Oil and Gas decommissioning. Our current business focus is the safe and efficient decommissioning of the Greater Dunlin Area, comprising the Dunlin field, Osprey and Merlin subsea satellite fields and associated infrastructure. Fairfield Energy is a wholly owned subsidiary of Decom Energy Limited that has been established to provide services as an ultra-late life decommissioning operator and business partner to the industry.

We recognise our responsibility to take a robust approach to preventing modern slavery in our corporate activities that includes ensuring that our supply chain is free from any form of modern slavery. Our suppliers play a critical role in our business, and our relationships with them are based on achieving the best performance in an ethical and sustainable manner.

Accordingly, we have taken the following steps to mitigate the risk of modern slavery in our business and the wider supply chain:-

Policies & Procedures

We have established the following policies and procedures which set ethical standards for our business activities and are relevant in terms of both the prevention of modern slavery and the reporting of concerns:-

- The Recruitment & Selection Policy, Right to Work in the UK Policy and associated procedures describe the processes to be followed for the hiring of personnel into our business. The Policies ensure that thorough processes are followed and that the appropriate employment-related checks are undertaken to safeguard against human trafficking or enforced labour.
- The Contracts & Procurement Policy sets out our commitment to contract and procure goods and services using sound commercial strategy and best practice to ensure quality, delivery and fitness for purpose. It further ensures that procurement activity complies with defined contracts and procurement standards and procedures to ensure a transparent and ethical process, and that contracting parties observe strict adherence to the requirements of the relevant regulations and legislation.
- The Code of Business Ethics sets the standard for conduct in our business activities and governs the manner in which we behave as an organisation, including how we expect our workforce to act. It reflects our commitment to acting ethically and with integrity in all business relationships, and to implementing and enforcing effective systems and controls to ensure as far as possible that modern slavery is not taking place either within the organisation or the supply chain. The Code is widely publicised throughout the business and frequently reviewed to address any opportunities for improved performance and provide assurance regarding internal compliance with the Code. The Audit and Risk Committee assists the Board in monitoring ethical business conduct, as well as the effectiveness of the Code and its supporting processes.



- The Whistleblowing Policy makes provision for the raising of concerns related to fraud, malpractice, danger, misconduct and illegal acts without fear of retribution, victimisation or detriment. The associated procedure is designed to make it easy for workers to make such disclosures and is detailed in the Policy which is publicised on the internal Intranet and Business Management System.

The Supply Chain

We are committed to ensuring transparency in our business activities, including our approach to tackling modern slavery throughout the supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. From 2018 our contractual documentation has necessitated that contracting parties confirm their commitment to the requirements of section 54 of the Modern Slavery Act 2015 and that modern slavery 'due diligence' is undertaken as part of their operations and supply chains. As part of our robust contracting process, a vendor due diligence process is carried out prior to entering into a contracting arrangement in order to minimise supply chain risk. Any new supplier must participate in a formal procurement process before appointment and will be subject to review and audit to ensure compliance with the terms of the contract going forward.

Training & Compliance

All personnel (including directors, officers, employees and contract, agency or temporary workers) are provided with the Code of Business Ethics and are required to sign an Annual Compliance Certificate to confirm an ongoing understanding of the terms of the Code (as amended), and compliance with its objectives and requirements in terms of ethical standards.

We also provide training for our Contracts & Supply Chain professionals to enhance their understanding of the risks of modern slavery and human trafficking. The training provides knowledge and guidance on the meaning and forms of modern slavery, the preventative measures that must be implemented, and steps that should be taken in the event that any concerns are identified within our supply chain.

Ongoing Review

We recognise the importance of multi-stakeholder collaboration and peer learning as we seek to strengthen our ability to assess and address modern slavery risks in our business and supply chain. We will continue to evaluate and review our processes for the combatting of modern slavery and to improving our approach to managing the risks as we learn from our risk reviews, refine our practices, and continue to build capability in our business.

Board Approval

This statement was reviewed and approved by the Board of Directors of both Fairfield Energy Limited (including on behalf of Fairfield Betula Limited) and its parent, Decom Energy Limited.

Handwritten signature of John Wiseman in blue ink.

John Wiseman
Managing Director of Fairfield Energy

Handwritten signature of Graeme Fergusson in blue ink.

Graeme Fergusson
Managing Director of Decom Energy

27 February 2019