

Modern Slavery and Human Trafficking Statement 2018

This Statement is made pursuant to section 54 of the Modern Slavery Act 2015. It outlines actions taken by Stena Drilling Ltd to prevent Modern Slavery and Human Trafficking in its business and supply chains for the financial year ending 31st December 2018.

Our Position

Stena Drilling Ltd conducts its operations ethically in terms of all business dealings and relationships. The Company prides itself on its reputation for acting fairly and honestly wherever it does business. The Company's reputation is built on its core values (Care, Innovation & Performance), the values of its employees and its collective commitment to acting with integrity throughout the organisation. Stena Drilling is part of the larger Stena AB group.

Stena Drilling has a zero-tolerance approach to Modern Slavery. The Company continues to recognise its responsibility to address and mitigate the risk of Modern Slavery and Human Trafficking within its global operations. This statement sets out our commitment and actions taken to attain the above assertions.

Our Operations and Supply Chains

Stena Drilling is a prominent independent drilling contractor, staffed to operate a fleet of mobile drilling vessels providing customers with drilling services. Our operations focus on combining maximum performance with a high level of safety.

Throughout its operations the Company obtains a variety of goods and services from global suppliers. The aim is to establish and maintain a competitive, reliable, and sustainable supply chain wherever it operates. In dealing with all these suppliers the Company endeavours to always act in an ethical and socially responsible manner.

Relevant Policies and Actions

- Stena Drilling has a high level 'Modern Slavery and Human Trafficking Policy' which confirms its zero-tolerance approach to Modern Slavery. The policy verifies that the Company would terminate its relationship with other individuals and organisations working on its behalf if they are found to be in breach of the policy.
- For all offshore employees Stena Drilling adhere to the Maritime Labour Convention (MLC) 2006 standards for conditions of employment. Including but not limited to; wages, hours of rest, repatriation, employment contracts, medical certification, accommodation and training. Seafarer's employment agreements (contracts of employment) were audited and approved by the Maritime and Coastguard Agency in June 2018. All seafarers were re-issued with the updated compliant documentation in July 2018.
- The Company's vessels have been audited by the Maritime and Coastguard Agency against the Maritime Labour Convention 2006 within the last year. This has proven our adherence to MLC standards.
- Third party audits have been conducted to ensure and confirm labour standards. Third party labour providers Maritime Labour Convention accreditation document has been obtained and tracked.

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- Stena Drilling's recruitment procedure includes a screening process to confirm eligibility to work to protect against modern slavery and human trafficking.
- The Company's supplier qualification processes include the use of Achilles First Point Assessment (FPAL) which qualifies, evaluates, and monitors suppliers on behalf of the UK Oil and Gas Industry.
- All employees have completed e-learning training in relation to the Company's Code of Conduct and Anti-Bribery and Corruption Policy. Both policies outline the expectation that its employees will conduct business with the highest level of integrity and respect for the interests of those with whom it has relationships.

Responsibility

The Board has overall responsibility for ensuring legal and ethical obligations relating to Modern Slavery and Human Trafficking are met, and that all those under the Company's control comply. Stena Drilling is committed to monitoring its policies and actions as outlined in this Statement.