

Human Rights, Modern Slavery and Corporate Social Responsibility

To be a recognized **industry leader**
and trusted partner, delivering **value**
to the **energy** industry.



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Policy

This Human Rights, Modern Slavery and Corporate Social Responsibility (CSR) policy sets out MR Group's ongoing commitment to behave ethically in all aspects of our day-to-day business operations.

As a company, we aim to act in accordance with internationally recognised human rights standards and relevant legislation in the jurisdictions in which we operate including the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights and integrate them into our operations. We aim to add value to our employees, suppliers, the local community and society as a whole.

MR Group 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 and 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.

We uphold this policy by adopting practices that ensure MR Group operates in ways that meet or exceed ethical, legal, commercial and public expectations. Our policy includes strategies to make socially responsible decisions, conform to high standards of ethical behaviour and comply with all relevant legislative requirements. The CSR policy is focused on three key areas:

- People
- Environment
- Community

People

MR Group seeks to avoid causing or contributing to adverse human rights impacts through our activities and address such impacts if they do occur in a timely and appropriate manner. We will continue to look for ways to support the promotion of human rights within our sphere of influence. We are committed to improving our employee's general health and wellbeing, thus benefiting their work-life balance and overall performance.

Environment

MR Group values the importance of minimising its environmental impact. The company has an Environmental Management Policy in place outlining its efforts to reduce consumption of resources and make use of recycling initiatives wherever possible. MR Group complies with all relevant environmental regulatory requirements.

Community

MR Group contributes to communities in their areas of operations by sourcing local personnel where possible, actively seeking local interns, supporting local charities and supporting local businesses. We also enjoy ongoing involvement in the community through corporate sponsorship.

MR Group is a global engineering and technical consultancy business of significant breadth we work across a multitude of stakeholder and client partnerships from our offices currently located in multiple countries.

Correspondingly our supply chain is required to align to our global portfolio of projects. Historically our supply chain has been managed at a country or regional level.

Due Diligence and Supply Chain

MR Group recognize 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, although as an engineering and technical consultancy business we consider the risk of Modern Slavery existing within our business and supply chain to be low. Therefore, we take a risk-based approach to assessing the likelihood of the existence of Human Rights, Modern Slavery and Corporate Social Responsibility within our supply chain and have proportionate controls and mechanisms in all stages of our operations cycle.

A non-exhaustive example of MR Group suppliers include the provision of contingent labor and other service providers, travel related providers, airlines, hotels and other travel service providers, facilities, IT and IS related goods and services.

Policy Framework and Controls

MR Group has a zero-tolerance approach to Human Rights, Modern Slavery and Corporate Social Responsibility and our Code of Ethics helps us to ensure that we do things safely, ethically and responsibly. Its role is to ensure everyone who works for, or with a member of the MR Group understands that unlawful or unethical business practices will not be tolerated.

All our employees and contractors are required to comply with this policy safeguarding against Human Rights, Modern Slavery and Corporate Social Responsibility.

Other key MR Group policies associated with safeguarding against Human Rights, Modern Slavery and Corporate Social Responsibility:

- Speaking Out

Our whistleblowing facility seeks to ensure that all employees and contractors can raise serious concerns, which they believe indicate malpractice or wrongdoing within MR Group, without fear of being dismissed or otherwise disciplined or jeopardising their position.

- Responsible Procurement & Sourcing

We have a policy for our suppliers to commit to fair employment policies, including humane treatment of their employees and no use of child labour, consistent with our commitment to act against any form of Human Rights, Modern Slavery and Corporate Social Responsibility. The principles of this policy focus on environmental, ethical and social responsibility and are anchored in internationally recognised standards, including the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the Global Compact.

Key Performance Indicators

MR Group made the following progress against performance targets:

- Suppliers - Record all decisions to reject suppliers based on a high risk of Human Rights, Modern Slavery and Corporate Social Responsibility.

- Incidents – No Incidents of Human Rights, Modern Slavery and Corporate Social Responsibility reported through our internal reporting mechanisms.

Our Continued Commitments and Beyond

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.

This statement was approved by the Board of Directors of MR Group Holding Pte Ltd, upon recognition of the Modern Slavery Act 2015.

Human Rights, Modern Slavery and Corporate Social Responsibility - Risks

The following requirements address material Human Rights, Modern Slavery and Corporate Social Responsibility risks identified by MR Group.

Category	Requirement
Child labour	Children may not be hired before completing their compulsory education (as required under applicable local law). Notwithstanding local requirements, the minimum age for entry into employment must not be younger than 15 years of age. However, we support legitimate workplace internships and other similar programs that comply with applicable laws and regulations
Modern Slavery	We will not use and suppliers may not engage in forced, bonded or involuntary labour practices. Employees are not required to lodge large deposits or identity papers with the company and may leave after giving reasonable notice with all outstanding wages to be paid. We have a zero- tolerance approach to human trafficking
Inhumane treatment of employees	The company and its suppliers must create and maintain a work environment that treats all employees with dignity and respect. Any threat of violence, sexual exploitation or abuse, and verbal or psychological harassment or abuse are not tolerated
Living wage and working hours	Wages and benefits paid for a standard working week must satisfy, at a minimum, national legal standards or local industry benchmarks, whichever is higher. In countries where no minimum wage legislation exists, suppliers must seek to establish a living wage that ensures an adequate standard of living for all its employees and their dependants. MR Group will ensure that working hours are reasonable and comply with legal and industry standards.
Equality	MR Group is fully committed to eliminating discrimination in recruitment, training and working conditions, on the grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability or social origin and to promoting equality of opportunity and treatment
Workplace health & safety	The company and suppliers must ensure: • the provision of safe and healthy working facilities and appropriate precautionary measures to protect employees from work-related hazards and anticipated dangers in the workplace • workers receive regular and recorded health & safety training • accommodation, where provided, is clean, safe and meets the basic needs of workers The company and suppliers must:

	• follow all relevant legislation, regulations and directives in the countries in which the contract activities are undertaken to ensure a safe and healthy workplace • ensure that systems are implemented for the prevention of occupational injury and illness including, at a minimum, standards for fire safety, emergency preparedness and response, industrial hygiene, lighting and ventilation, machinery safeguards, reasonable access to potable water, and reporting and investigation of occupational injuries and illness • assign responsibility for health & safety to a management representative • comply with MR Group policy relevant to work undertaken as part of the supply contract with MR Group
Security	We protect personnel and assets to provide a safe and secure workplace. We maintain processes to risk assess projects and worksites to ensure the safety and security of personnel. Any projects with a potential security risk are assessed by senior management prior to staff mobilisation to ensure risk mitigation is enacted or the project not proceeded with
Freedom of association	MR Group and suppliers must adopt an open attitude towards the legitimate activities of trade unions. Workers' representatives must be allowed to carry out their legitimate representative functions in the workplace and may not be discriminated against
World Heritage sites and IUCN Protected Areas	Materials may not be sourced from World Heritage listed sites or International Union for Conservation of Nature Protected Areas
Corruption, bribery and extortion	MR Group prohibits bribery and corruption in all MR Group business dealings in all countries. This prohibition applies equally to consultants and other third parties who deal with others on behalf of MR Group, including any relevant suppliers. Specifically, the MR Group policy prohibits the offer, promise, gift or authorisation of a payment or anything else of value, either directly or through an intermediary, to: • a government official in an effort to influence official action • anyone else in order to induce that person to perform their job improperly to benefit MR Group Under no circumstances are kickbacks, facilitation payments, secret commissions or similar payments permitted. Payments that are prohibited generally include cash payments and can include other things such as gifts, hospitality, travel, favours, business opportunities and charitable donations, depending on the circumstances. A government official is a broad term which includes any officer or employee of a government at any level, government-owned or controlled entity or enterprise, or public international organisation. All contract-related transactions and payments, including those in connection with gifts and hospitality and other expenditures, must be accurately recorded in reasonable detail in the books and registers of any supplier who works on behalf of MR Group
Compliance with legislation and regulations	MR Group and suppliers must comply with all legislation and regulations in the countries in which it operates with respect to: • Human Rights • Modern Slavery • Health, Safety and Environment • Employment • Anti - discrimination an equality • Child labour • Freedom of association • Corruption, bribery and extortion

Grievance and Remediation

Where a violation of this policy is identified we will work with all parties involved to seek remedy, compensation and justice for the victim. We will investigate the root cause and take appropriate steps prevent any violation reoccurring.

Supporting and Reference Documents

- Human Resources Policies & Procedures Manual
- Quality Management System Manual

Authorized by
Duco De Haan, MR Group
Chief Executive Officer

A handwritten signature in black ink, consisting of a large, stylized 'D' and 'H' followed by a horizontal line.

6 October 2024

MR Group Holding Pte Ltd