

# Slavery and Human Trafficking Statement

This Statement is made on behalf of Briggs Commercial Limited Group (“Briggs”), pursuant to Section 54(1) of the Modern Slavery Act 2015 (“Act”), and the statement sets out Briggs’ actions to understand all potential modern slavery risks related to business, and what steps are taken to prevent Slavery and Human Trafficking.

We are proud of the conditions of employment for all our employees throughout Briggs. Given the nature of our business, the Board of Directors and our management teams consider that, either within Briggs or the supply chains which support our business activities, there is minimal risk of involvement, even tangential support, or complicity in slavery and human trafficking. The employment and procurement practices operated by the businesses within Briggs ensure that the Group is rightly viewed as a supportive employer. To the extent that our companies operate as a purchaser of goods and services, we outline our expectations of ethical conduct from those organisations with which we do business.

## Organisation Structure

Briggs Commercial Limited is the Parent Company for a group of companies supplying services across a range of industries working on and offshore in the marine sector with services that include; vessel charter and management, submarine cable installation, repair and survey, diving services, marine survey, installation and maintenance of Aids to Navigation, salvage and wreck removal, oil and gas terminal operations, environmental consultancy and emergency oil spill response.

Briggs is registered in Scotland, with its head office located in Fife, operating principally in the UK with overseas operations in Baku, Azerbaijan. There are just fewer than 700 employees worldwide.

## Our Supply Chains

Briggs’ supply chains are extensive. We use routine services for the maintenance and support of our operations in UK and Baku such as technical support services, information technology and communications infrastructure. We do not act as a producer or manufacturer of physical goods and have no supply chain in relation to such activities.

## Anti-slavery Policy Statement:

Briggs has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

This Anti-Slavery Policy Statement is the principal articulation of Briggs' policy on slavery and human trafficking. It is intended to inform and influence all the operational procedures within Briggs.

Our stated Anti-Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure (amongst our other priorities) that slavery and human trafficking is not taking place anywhere in our business or related supply chains.

### **Due Diligence and Implementation Processes for Slavery and Human Trafficking**

As part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery) we operate a range of policies and procedures appropriate to the different companies within Briggs. These include the policies and procedures in the following areas:

- Third party provider and outsourcing; and
- Anti-money laundering, bribery and financial crime.

Briggs also articulate a series of employee rights and benefits available to employees in the policy and procedure documents, and individual contracts of employment for each member of staff.

We comply with the Marine Labour Convention 2018 in our employment of seafarers, supporting the Internal Labour Organizations' objective of promoting opportunities for women and men to obtain decent and productive work, in conditions of freedom, equity, security and dignity.

Our Board of Directors has reviewed and agreed to the terms of this statement. Departments and executives have reporting responsibilities to management and the various boards of companies within the Briggs Group. Briggs uses the services of Morris and Young as their external auditor.

A combination of these policies, procedures and functions operate to help identify, assess and monitor potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in them.

### **Training**

We will communicate this statement to all our staff to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business and in future will include references as part of Briggs' training and information materials.



## Legal and Regulatory Purpose of this Statement

This statement is made with regards to the obligations arising under section 54(1) of the UK's Modern Slavery Act 2015 (the Act). Accordingly, this statement should be considered to constitute the slavery and human trafficking statement of Briggs.



Collieson Briggs  
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