

## Modern Slavery Transparency

2024 - 2025

# Company Statement


This document is applicable to all companies within 3t,  
please refer to 3t M 001 Section 2 for organisational context

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Prepared By Emma Howorth  
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### Approval

Name(s):	Kevin Fraklin	Review Date:	Nov 2024
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Position(s):	CEO	Next Review:	Nov 2025
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Signature(s):	
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## Amendments

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2	Annual review – no updates	All	04/01/2021	B Cowen	E Howorth
3	Updated Approval Section	1	05/05/2021	James Grand	Beth Cowen
4	Annual review – no updates	All	07/01/2022	B Cowen	E Howorth
5	Annual review – no updates	All	04/01/2023	B Cowen	E Howorth
6	Full document review and update	All	06/09/2023	Martin Hottass	Jill Ogilvie
7	Update to Company Name	All	29/11/2023	J Ogilvie	E Howorth
8	Transparency update	All	13/11/2024	J Ogilvie	E Howorth

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## 1. Policy Statement

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that 3t has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. 3t has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## 2. Our Business

At 3t, we harness the power of technology to transform training and enhance performance, enabling the people and companies in the global energy sector to work safer, smarter, and more efficiently. With a global customer base, we operate across 60 countries and are represented by a diverse workforce of over 17 nationalities, with offices and training centres located in the UK, North and South America, and the Middle East.

At 3t we are committed to conducting our dealings, whether with customers, suppliers, employees or the communities in which we are based, with the utmost integrity and as such we are committed in our support for the elimination of modern slavery in all its forms. All our businesses, wherever they are located and wherever they have dealings in the world, are required to respect people and to value their diversity.

We have a zero-tolerance policy for any form of modern slavery, coerced labour or human trafficking, both within its own businesses and within its supply chain.

Relevant companies for the purposes of section 54(2) of the Modern Slavery Act 2015:

- Transforming Training with Technology Limited
- 3t Digital Limited
- 3t Training Services Limited
- Utility & Construction Training Limited
- Drilling Systems (UK) Limited
- Gulf Technical & Safety Training Centre L.L.C. (GTSC)
- ALL STOP! Survival & Safety Training

This statement relates to 3t Group, covering all business regions, operating companies and business units throughout the world, including our subsidiaries. The statement relates to the financial year ending 31 March 2024.

## 3. Supporting Policies

We promote ethical values and behaviour within our business and our supply chains, and we are committed to conduct all business relationships with ethical principles. We encourage and empower all our employees to be vigilant and immediately to report any concerns they might have in this respect.

We review and update our policies and practices regularly as we learn from our experiences. They are designed to ensure that people are treated with dignity and respect.

The following internal policies ensure that 3t is conducting business in an ethical and transparent manner. These include:

- Code of Conduct
- Labour and Human Rights Policy
- Anti-Bribery Policy
- Equal Opportunities and Diversity Policy
- HSEQ Policy
- Whistleblowing Policy

#### 4. Due Diligence

By ensuring that our supply chain operates with integrity and transparency, we can explicitly define the standards and expectations that our suppliers must adhere to when conducting business with us. As part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate).
4. We may terminate the contract at any time should any instances of modern slavery come to light.

3t will achieve these aims by utilising initiatives to identify and mitigate risk in the following ways (But not limited to):

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.).
- Continually audit & review of practices for checking all employees are paid at least the minimum wage and have the right to work.
- The encouragement of the reporting of concerns and the protection of whistle blowers.
- 3t will not knowingly support or deal with any business involved in slavery or human trafficking.
- 3t will have zero tolerance to slavery and human trafficking and expect all those in the supply chain and contractors to comply with 3t values.

#### 5. Identifying, Assessing, and Managing Risk

We believe that our exposure to the risks of modern slavery is low within our own business and supply chain. This assessment is under continuous review so that we can determine if circumstances change that require us to take additional actions.

3t requires all potential suppliers to demonstrate their capacity to meet our contractual requirements. We also look for a clear demonstration of commitment to corporate social responsibility. We expect high standards of conduct from our suppliers in what they will do either for us or for our customers. We will not accept any behaviour contrary to our codes.

Our suppliers are generally local, although some are part of national or global businesses. We establish long-term relationships with suppliers and avoid making demands of suppliers that

might lead to them violating human rights. We identify risks to workers in our supply chain, carrying out due diligence before we engage suppliers and throughout the relationship. We are committed to buying quality products and services from ethical suppliers and require our suppliers to engage in accordance with our standards.

## 6. Training

3t continue to raise awareness of Modern Slavery within our recruitment, operations and supply chain. We have clear policies and monitoring procedures that are accessible to all employees through our Employee Portal.

To ensure a high level of understanding of the risks of modern slavery and human trafficking across supply chains and the business, 3t provides briefing to all employees.

## 7. Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

For transparency the company will publish the Modern Day Slavery & Trafficking Act 2015 Policy Statement on its website for the public, stakeholders and employees to view.

This policy applies to all those employed by 3t.

During the year we received no reports regarding human rights and modern slavery and we have not identified any instance of modern slavery across our supply chain. We will continue to assess performance measures to evaluate progress going forward.