KBC MODERN SLAVERY ACT STATEMENT 2019

Introduction

KBC is a leading technology-based consulting company operating within the energy and chemical industries. KBC is a trusted advisor delivering advanced solutions for operational excellence and profit improvement in hydrocarbon facilities.

This statement sets out KBC’s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities for the current financial year. It is made pursuant to section 54(1) of the Modern Slavery Act 2015.

The Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

KBC currently operates on a global level with four key hubs in the UK (Walton on Thames), US (Houston), Asia (Singapore) and the Middle East (Abu Dhabi).

KBC’s supply chain includes employing the services of subcontractors and associates and engagement with recruitment agencies. KBC is committed to ensuring that its suppliers adhere to the highest standards of ethics.

High-Risk Activities

KBC and its subsidiaries (please refer to the Organisation Structure on page 3) does not believe it has any activities that are considered to be at high risk of slavery or human trafficking.

Due Diligence Processes

KBC undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company’s due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supply chain;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.
To ensure staff are fully aware and understand the risks of modern slavery and human trafficking in its supply chains and business, KBC will ensure that relevant individuals are fully briefed on the subject where required.

Further Steps

KBC will take the following steps:

- Develop a specific policy and to share this with our existing supply chain.
- Further enhance the Company’s due diligence processes.
- Continue to review its existing supply chains on an ongoing basis.
- Provide modern slavery training to those managers involved in the supply chain.
- Ensure there is a stringent criteria applied to supply chain providers.
- Carry out annual audits are conducted to ensure compliance.

The Company encourages all its workers, customers, associates and other business partners to report any concerns related to the direct activities, or the supply chains of the business. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company’s whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Approval

This statement has been approved by our board of Directors of KBC Advanced Technologies Limited, who will review and update it as necessary on an annual basis.

Director’s Approval Signature:

Andrew Howell
Chief Executive Officer