



James Fisher's modern slavery act transparency statement

James Fisher and Sons plc (the "Company") and its subsidiaries, including (but not limited to) James Fisher Everard Limited, JFD Ltd, James Fisher Marine Services Limited and James Fisher Nuclear Limited (together the "James Fisher Group" or "Group") have a zero tolerance approach to any form of modern slavery and we are committed to acting in an ethical manner and with integrity and transparency in our business dealings.

This statement outlines the steps taken by the James Fisher Group in the financial year ending 31 December 2022 to ensure that slavery and human trafficking is not taking place within any part of our business or within our supply chains.

1. Our organisation

The James Fisher Group delivers solutions, innovation and specialist engineering across three key markets: Energy, Defence and Marine Transport, and employs 2,449 people across 18 countries. In 2022 the James Fisher Group generated revenue of over £450 million.

2. Policies

Our Slavery and Human Trafficking Policy, Anti-Bribery and Corruption Policy and Code of Ethics reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure as far as possible that slavery and human trafficking are not taking place within the Group or within our supply chains. Our policies are complemented by a compliance programme which includes training, risk assessments, monitoring and review processes. Following approval by the Company Board, our Slavery and Human Trafficking Policy is disseminated to all trading companies within the James Fisher Group and each business is taking steps to ensure that its staff and its suppliers are aware of the policy and that they understand and comply with it. [Copies of our policies are available.](#)

3. Due diligence

3.1. The Group has carried out a risk assessment to assess potential areas of risk within the Group with regard to modern slavery. Risk has been assessed by reference to the relevant Group company's sector, the location of its suppliers, and the types of products and services procured.

3.2. Where the Group has established potential risk, those Group companies have adopted their own detailed risk assessment in line with the Group policy and by reference to the same criteria. To ensure compliance across the Group, information from those relevant Group companies' assessments is being analysed and recommendations are being made to ensure that the Group companies are reducing any perceived risks, including within their supply chains.

3.3. Via our supplier pre-qualification procedures, suppliers are asked to confirm that they undertake due diligence to assess whether or not slavery and human trafficking exists within their own supply chains.



4. Monitoring risk and ensuring compliance

4.1. The Group companies will continue to monitor compliance on an ongoing basis, through:

- Identifying and assessing potential risk areas in supply chains.
- Based on those assessments, mitigating the risk of slavery and human trafficking occurring in their supply chains, through requiring suppliers to comply with our Slavery and Human Trafficking Policy via supplier pre-qualification procedures, the James Fisher Standard Terms and Conditions of Purchase, and other contractual terms. Copies of the Slavery and Human Trafficking Policy are provided to suppliers and suppliers are asked to confirm that they will comply with the policy in order to aid compliance.
- Monitoring potential risk areas in supply chains.
- Protecting whistle blowers.

4.2. Supported by our audit, legal and business teams, on-going compliance within the Group is the responsibility of Group trading company managing directors who are required to monitor compliance and report to their local boards and to the Group Chief Executive Officer who has overall responsibility for compliance.

5. Training

5.1. We make training available to our staff on an on-going basis to ensure their understanding of the risks of modern slavery and human trafficking in our businesses and supply chains.

This statement is made in accordance with the reporting requirements of Section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's Modern Slavery Statement for the financial year ending 31 December 2022.

Approved by the Board of Directors on 7 March 2023.