



## **UK Modern Slavery Act 2015**

Statement for Year Ending 31/12/2021

Published: May 2022

### **Overview**

Oil States Industries (UK) Limited (hereinafter the “Company”) is a UK registered company (SC163254) and subsidiary of Oil States Industries, Inc which is headquartered in Houston, Texas. Oil States International, Inc, the ultimate parent company of Oil States Industries, Inc and its subsidiaries, is headquartered in Houston, Texas and is publicly traded on the NYSE under the symbol “OIS”. Oil States Industries (UK) Limited along with Oil States Industries, Inc shall be collectively referred to within this statement as “Oil States”.

Oil States is a major global provider of integrated energy systems and solutions for oil and gas, industrial and military sectors. The Company has an annual turnover in excess of £36 million and is therefore required to publish an annual statement in accordance with the Modern Slavery Act 2015.

Oil States operates globally. Countries of operations include, but are not limited to, Abu Dhabi, Australia, Brazil, India, Singapore, Thailand, Vietnam, the United Kingdom and the United States of America.

The Company’s financial year runs from 01 January – 31 December each year.

### **Objective**

The Company recognizes the importance of eliminating Modern Slavery and understands that Modern Slavery can take many forms, including but not limited to child or forced labour and human trafficking. The foregoing examples, along with the offences specified within Part 1 of the Modern Slavery Act 2015 shall be collectively referred to as “Modern Slavery” throughout this statement. Modern Slavery is the fastest-growing international crime, affecting people, economies, businesses and industries worldwide. The purpose of this statement is to express the commitment of the Company to comply with the UK Modern Slavery Act of 2015 (hereinafter “the Act”), and to identify the resulting due diligence efforts that the Company has committed to in relation to the Act. In order to achieve compliance, transparency and clarity, this statement also outlines the expectations the Company has towards its direct suppliers with respect to the Act.

### **Policy**

The Company recognises the responsibility to respect the human rights of its employees. Furthermore, the Company is aware that Modern Slavery not only destroys the lives of individual

victims, it is also harmful for business and the economy. The Company is committed to taking a zero tolerance approach to Modern Slavery within its own business and spheres of influence and shall take the necessary actions to comply with the requirements set forth in the Act.

The Company is committed to acting ethically and with integrity in all our business relationships and shall endeavor to enforce effective systems and controls to ensure Modern Slavery is not taking place within its business or its supply chains. The Company expects its direct suppliers to also act ethically and with integrity in their business relationships and where possible, requires all direct and/or potential suppliers to have effective measures in place to ensure that no Modern Slavery exists within their businesses or supply chains.

### **Risks**

The following have been identified as potential areas of increased risk:

1. Where there is a contractual need to comply with local content requirements, there is a risk that non-registered or non-ethical recruitment agencies may be used to hire workers or that the materials will be sourced from non-ethical brokers;
2. As a provider to the global oil and gas industry, the Company often sources materials from suppliers worldwide, increasing the risk of Modern Slavery as a number of the top exporting countries of metals that are used within our product lines and manufacturing processes may be considered to be 'high risk';
3. Given that employees, agents and suppliers of the Company often perform services in remote locations or offshore, the risk for sex workers and corresponding sex trafficking activity may be increased;
4. Personal Protective Equipment (PPE) is provided to employees and is required to be worn where there are health or safety risks at work. Although most PPE is purchased from UK suppliers, it can be sourced from countries where there is a high risk of Modern Slavery.

### **Due Diligence**

In the financial year ending 31<sup>st</sup> December 2021, the Company continued to implement the following due diligence efforts.

- **Recruitment**

In countries where there is a contractual duty to comply with local content requirements, the Company shall require that the use of non-verified and non-approved recruitment agencies is prohibited throughout the supply chain in those areas. In addition, where workers are sourced locally in risk areas, the Company will examine the labour conditions of such local workers, such as time and wages, discrimination policies, living conditions, health and safety policies, grievance mechanisms, employee training and freedom of movement to ensure that all local workers are treated fairly and ethically.

- **Sourcing of Materials**

The Company recognises that the sourcing of materials from countries with high levels of risk highlights the importance of implementing effective due diligence and ethical mapping of supply chains to prevent involvement in Modern Slavery.

The Company's Terms and Conditions of Purchase contains a 'Conflict Materials' clause which provides that suppliers are contractually obligated to comply with Section 1502 of the United States Dodd Frank Wall Street Reform and Consumer Protection Act which requires suppliers to disclose whether their products contain any tin, tantalum, tungsten and gold ("Conflict Materials") and, to the extent reasonably possible, to use best efforts to track the chain of custody of any Conflict Materials contained in any of the goods, rental equipment or materials provided to Company. Furthermore, this clause also provides that suppliers shall encourage sub-suppliers to comply with the requirements therein and to support industry efforts to enhance traceability and responsible practices in global mineral supply chains.

- **Supplier Policy**

If the Company becomes aware of any supplier whose supply chain practices include any of the offences included in the Act, it is expected that they will take the appropriate actions to remedy the situation in a timely manner, including the reassessment of those supplier relationships. The Company will seek to do business with suppliers who take similar measures with their own suppliers to ensure alignment throughout the chain.

- **Human Sex Trafficking**

Human sex trafficking is the most common form of modern-day slavery. Given that the demand for sex workers and corresponding trafficking activity may increase in more remote areas or near offshore rigs, we have a zero tolerance approach for any employee found to be facilitating or participating in (whether directly or indirectly) human sex trafficking. Any employee found to be involved, whether knowingly or not, in human sex trafficking will be subject to disciplinary action. We will encourage direct suppliers to provide similar training for their employees to ensure that no workers put themselves in situations where they could be facilitating or participating in human sex trafficking during the course of their work.

- **Employee Complaint and Reporting Process**

Oil States encourages all employees, customers, suppliers and other business partners to report any ethical concerns relating to their activities or supply chains. Our ethics hotline is extended to include Modern Slavery and is designed to make it easy for disclosures to be made without fear of retaliation. Further information on our Corporate Code of Business Conduct and Ethics, as well as instructions on how to report ethical concerns, can be found at <http://www.oilstatesintl.com/corporate-governance-1223.html>.

- **Training and Education**

The Company commits that relevant employees will gain a high level of understanding of Modern Slavery and the risks of it occurring within its supply chain and businesses. New Modern Slavery training will be sourced and rolled out to relevant employees in 2022.

- **Contracts**

The Company has a 'Modern Slavery' clause within their standard Terms and Conditions of Sale and Purchase. The clause entitles the Company to perform audits of its suppliers' due diligence processes and requires suppliers to take active steps to eliminate slavery within their supply chain. The Company shall also use endeavors to ensure that where the Company Terms and Conditions are not used, similar Modern Slavery clauses exist in the relevant terms and conditions governing the relationship between Company and supplier / customer either explicitly as a standalone clause, or implicitly included within a general 'Compliance With Laws' clause.

#### **Reflection on 2021**

- 2021 remained a challenging year for companies around the globe and continued challenges were faced due to the COVID-19 pandemic and further lockdowns, however, the Company remained committed to generating ideas on how to ensure Modern Slavery is not taking place within the Company's supply chain. As such, the Company has agreed to review the training requirements with regards to Modern Slavery in 2022.

#### **Objectives / KPIs for 2022**

- Finalise the revised Vendor Questionnaire form which incorporates Modern Slavery statements and send out to new suppliers. This was an objective for 2021 but has not yet been given internal approval. The Company's intention is that the next Statement will detail the number of suppliers that have been sent the amended Questionnaire and the number of suppliers who have returned the forms.
- New Modern Slavery training to be sourced and rolled out internally.

#### **Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's Modern Slavery statement for the financial year ending 2021. It has been approved by the Company's Board and will be reviewed and updated annually.



Garry Stephen, Vice President

For and on behalf of Oil States Industries (UK) Limited

Date: 30<sup>th</sup> May 2022