

Modern Slavery Act 2015- Anti-Slavery & Human Trafficking Policy Statement

As part of our vision to be the most successful outfitting Company in the world, making a difference by delivering the best customer experience everywhere we, MJM is committed to following all applicable laws and regulations and to improving our practices to combat slavery and human trafficking.

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

The Act requires certain businesses to provide disclosure concerning their efforts to address the prevention of slavery and human trafficking in their supply chains. These disclosures are intended to provide clients the ability to make better informed decisions about the services they buy and companies they support.

Our financial year ended on 31st December 2017

Company Background / Supply chain

MJM Marine Ltd is a multi-skilled organization operating in the manufacturing and construction sectors, offering services to a diverse range of clients worldwide. Our ultimate parent company is MJM (IOM) Holdings Ltd.

Our supply chain includes companies who supply raw materials, specialist trade contractors, labour-only subcontractors and specialist professional organisations that provide a range of services across the portfolio of projects we deliver for our clients.

Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-slavery policy
- Anti- bribery policy
- Whistleblowing policy

Due Diligence Process

MJM is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own operations and those of our supply chain. MJM recognizes that slavery and human trafficking can occur in many forms.

We believe that working in partnership with our clients, subcontractors, community stakeholders and supply chain in a sustainable way enables us to find more practical and safer methods of ethical trading free from slavery and human trafficking.

MJM has adopted a risk based approach to supplier selection and seek to identify and mitigate potential risk in engaging suppliers by carrying out reasonable enquiries into our supplier selection, with due consideration of our Anti- slavery policy.

MJM conducts audits of our supply chain and ensure that adherence to the Modern Slavery Act 2015 is considered as part of the audit.

MJM will only trade with those who we believe fully comply with the policy.

MJM provide a copy of the policy to all new employees at the same time as they receive their contract of employment.

Risk Assessment

MJM has added the policy to the Company's risk register and will assess the risk at regular intervals.

Measuring Effectiveness

MJM measures the effectiveness of its policy by the HR Director monitoring any referrals under the policy. The HR Director will consult with relevant Company Directors to discuss proposals for the year moving forward at the same time as the Company's annual statement is published.

Training for Staff

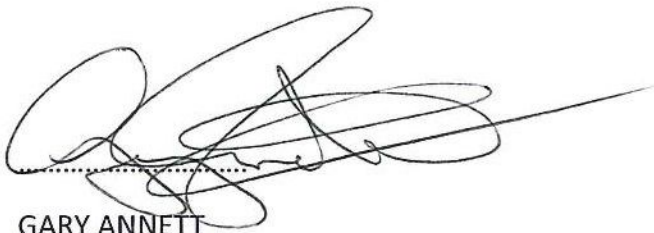
All Directors and Executive Leadership has been briefed on the Act- its application - the risks within supply chains and the indications of modern slavery and labour exploitation.

MJM discusses the policy with employees at 3 month and 6 month reviews and appraisals.

Further Steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chain we intend to raise awareness of our policy for e.g.: by referring to our policy in our Purchase orders and increasing our Labour only subcontractor's awareness of the policy. We will also add a relevant clause in our subcontractor's T&Cs.

This statement has been approved by our Board of Directors, who will review and update it as necessary on an annual basis. The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the MJM Slavery and Human Trafficking Statement for the financial year ending 31st December 2017.



GARY ANNETT

Chief Executive

Date: 22/11/18