



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction from the Chief Executive Officer

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced & compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings, relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

TWMA Group is committed to ensuring that there is transparency in our business and in our approach to tackling modern slavery throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners. As part of our contracting process, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children and we expect that our suppliers will hold their own suppliers to the same high standards.

All employees are expected to report concerns to compliance@twma.co.uk and management will act upon them.

The CEO and Executive Leadership Team shall take responsibility for implementing this policy statement, its objectives and shall provide adequate resources, for example training.

Organisation's Structure and Business

TWMA offers innovative and specialist drilling waste treatment solutions to the global oil and gas industry, onshore and offshore with offices in the UK, Norway, USA, UAE, Egypt and Angola. We currently employ more than 730 staff working across the world. Our turnover exceeds the threshold for transparency of a Modern Slavery and Human Trafficking regime.

Our supply chain involves a system of organisations, people and activities to bring our equipment, products and associated services from inception to the service sector of the oil and gas industry both onshore and offshore. Our business relationships involve the procurement of goods and services, outsourcing and subcontracting.

Our Policies on Modern Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships, and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

TWMA's Modern Slavery and Human Trafficking Policy is available on our website or can be requested from the Company.

Due Diligence for Modern Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk, we ask our proposed suppliers to complete a Vendor Approval Questionnaire and thereafter subject the vendors responses and company to scrutiny to facilitate the following:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of modern slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle-blowers.

Supplier Adherence to Our Values and Ethics

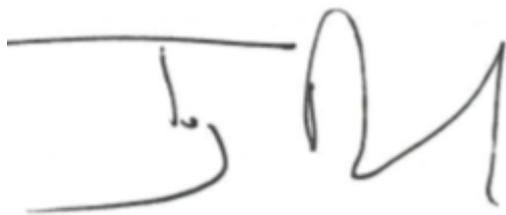
We have zero tolerance to modern slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values and ethics, we have in place a supply chain compliance programme which is capable of scrutinising, assessing, identifying and implementing all steps required to ensure compliance by our contractors and suppliers, with the assistance of our Procurement, HSEQ, Legal and Human Resources departments.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we seek to provide training to our staff on a reasonable and as required basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2019.

This policy statement will be reviewed annually and published.

A handwritten signature in black ink, appearing to read 'AJB', written over a horizontal line.

Antony J Branch
CEO

Issued: 01 November 2018

Next Review Date: November 2019