

SLAVERY AND HUMAN TRAFFICKING STATEMENT



This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (“**MODSA**”) and sets out the steps that Denholm Oilfield Services Limited and its subsidiaries (together “**Denholm Oilfield Services**”) have taken to ensure that slavery and human trafficking is not taking place in any part of their businesses or in their supply chains.

DENHOLM OILFIELD SERVICES

Denholm Oilfield Services prides itself on running its businesses to the highest standards of ethical conduct and social responsibility. It is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its businesses and will not deal with or support any business knowingly involved in slavery or human trafficking.

At the centre of this ethos is our ethics policy – The Denholm Standard – which reflects our commitment to acting ethically and with integrity in all our business relationships. This policy is based around four principles:

- Upholding the law
- Integrity
- Fairness
- Respect

Under the Respect principle Denholm is committed to respecting the people it works with and to providing a healthy, safe and satisfying environment for its staff to work in, which is free from harassment and discrimination. The Fairness principle dictates that all staff are treated fairly and the Upholding the Law Principle dictates that Denholm Oilfield Services complies with all applicable laws and regulations, including MODSA.

Denholm Oilfield Services expect all those in our supply chain to comply with our principles and local employment legislation.

SUPPLY CHAINS

During 2017, Denholm Oilfield Services conducted a high level risk assessment to identify whether (and if so, where) risks of modern slavery arise within our businesses and supply chains, this included conducting a review of our procedures, our policies and our practices for conducting supplier due diligence.

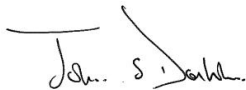
WHAT WE WILL BE DOING IN 2018

We will review the outputs of the high level risk assessment carried out in 2017 with a view to the adoption of appropriate and proportionate measures to better inform and assist us in developing good practice.

BOARD APPROVAL

The board of directors of Denholm Oilfield Services Limited approved this statement at its meeting of 18th December 2017 and this is our statement for the financial year ended 31 December 2017.

Signed for and on behalf of Denholm Oilfield Services Limited

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

John S Denholm
Executive Chairman